

SECTION 4 – ENFORCEMENT AND PROSECUTION

INTRODUCTION

The effective enforcement and prosecution of illegal dumpers under the state's illegal dumping laws and local ordinances is an essential component in making sure that a community's environmental enforcement program is a success. **If an environmental enforcement program does not have in place an effective process for enforcing the laws and prosecuting the illegal dumpers, the illegal dumpers will not change their behavior and the community will not see a reduction in illegal dumping.** These findings have been confirmed during conversations with a number of managers for environmental enforcement programs throughout the country.

The purpose of this section is to identify and discuss some of the enforcement and prosecution issues that can directly impact the overall success of a community's environmental enforcement program. This section will provide a series of recommendations with regard to each of these issues to assist local governmental officials in making sure their program's enforcement and prosecution of illegal dumpers is effective.

The reason for the less than desired success with the prosecution of these crimes is often due to a lack of communication with and education of the individuals who are involved in the enforcement and prosecution of these cases. Some of this confusion is due in part to the complexities of dealing with the environmental laws that address the illegal dumping crimes. In many cases, the prosecutors are familiar with the Iowa penal code, but are not as well versed in Iowa's environmental laws. This lack of familiarity with the law, as well as the perception by some prosecutors and judges that illegal dumping is not a "high priority" have been major factors in the lack of successful prosecutions of illegal dumpers in Iowa, as well as nationally. Despite these obstacles, environmental crimes are gaining increased

There is no room for "political positioning," "headline grabbing," or "foot dragging." If everyone does his/her job, everyone will be able to share in the credit – as well as a cleaner environment.

attention at the local, state and federal levels. Increased funding is being provided at all levels of government as elected officials and policymakers begin to realize the severity of this crime.

need for increased coordination between local, state and federal environmental officials in gathering the necessary evidence to arrest the illegal dumper. For an environmental enforcement program to be



Identifying Potential Dumpsites: Abandoned Strip Pits and Limestone Quarries

In Marion and Dubuque County, Iowa, illegal dumpers often find abandoned strip mining pits and limestone quarries to dump material. Former Sheriff Marvin Van Haaften, Marion County, Iowa, has noted that his deputies often find white goods and tires dumped in these pits. He also noted that by identifying these areas as potential dumpsites, the deputies are more aware of the places illegal dumpers like to go.

Since limestone quarries and strip mines were frequently established off major roadways in rural areas, these areas are ripe for illegal dumpers. If areas like these are identified, one proactive measure that can be taken is to "stakeout" the area at night.

To ensure that programs are operated effectively and efficiently, there is a

Did you know? Photographs are an effective tool in raising public officials awareness of illegal dumpsites in the area.

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successful it is important that all individuals involved in the enforcement and prosecution of illegal dumpers be willing to work together on a joint effort for the “common cause” of arresting all illegal dumpers. That means that city, county, solid waste management district, state and federal officials must be willing to work together. There is no room for “political positioning,” “headline grabbing,” or “foot dragging.” If everyone does his/her job, everyone will be able to share in the credit – as well as a cleaner environment. This section of the resource guide provides guidance on what roles key enforcement personnel should have in order to develop an effective environmental enforcement program.

ENVIRONMENTAL ENFORCEMENT OFFICERS

The environmental enforcement officer is the front line of defense in combating illegal dumping. If the local government’s program is going to be effective, in the battle against illegal dumping, it is essential that the enforcement officer position be staffed with the “right” individual and that he/she be “positioned” within the local government in such a way that his/her impact is maximized. Listed below are a number of issues with regard to the enforcement officer’s position that local governments should be aware of in order to maximize his/her impact.



E-Waste: The Future of Illegal Dumping?

“Brownwaste” or “E-waste” are computer peripherals that can include monitors, printers, cell phones, or the actual computers themselves. Since we live in an age where these items become outdated quickly and parts cannot be salvaged, disposal of these items is the only option.

These items contain many toxins that can seep into the ground if illegally dumped. Chemicals such as Antimony, Silver, Chromium, Zinc, Lead, Tin and Copper are commonly found elements in e-waste.

Environmental enforcement officials need to be aware of the dangers of e-waste and the potential for them to be illegally dumped. An excellent resource for information on e-waste can be accessed on the Internet at:

<http://www.svtc.org/cleancc/pubs/sayno.htm#toxics.htm>

Officer’s Qualifications

The environmental enforcement officer is often the primary, if not only person, the general public will come in contact with when dealing with illegal dumping. Therefore, it is important that he/she present a professional image with regard to his/her position as an environmental enforcement officer. The environmental enforcement officer should have the following qualifications:

- **Training.** The officer should have received sufficient training (at least 48 hours) so he/she is familiar with Iowa’s environmental laws. The officer should be able to explain these laws to the general public, people cited for illegal dumping, and if necessary, capable of “educating” the local prosecutor with regard to these laws. (Sources for training will be discussed later in this section.)
- **Good Educator/Good Communicator.** In addition to being knowledgeable in environmental law, the officer must be able to communicate well with all groups of people. Since a significant amount of the officer’s time (20-50% of the officer’s time, depending on the maturity of the program) will be spent educating the general public he/she must be able to communicate with school age children, neighborhood associations, business groups, etc. The officer must also be able to deal with illegal dumpers, in a professional manner. Finally, if the officer needs

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to assist in “educating” the public prosecutor(s) with regard to environmental law, it is essential that the officer be a good communicator.

- **Good Investigator.** To be an effective environmental enforcement officer, he/she must have not only good “policing” skills (ability to issue citations, make arrests, impound vehicles, etc.), but the officer must also be an excellent investigator. The officer must be a good detective and able to investigate the various illegal dumping scenes searching for clues that will lead to the identification of the illegal dumper. Skills include the ability to conduct surveillance, as well as to interview witnesses and suspects.

By retaining an officer with these qualifications, the program has a much greater chance of being successful in arresting, prosecuting and convicting illegal dumpers.

Commissioned Peace Officer Versus Code Enforcement Officer

There has been some debate as to whether the environmental enforcement officer needs to be a commissioned peace officer, or whether a code enforcement officer is sufficient.³⁰ In reviewing various environmental enforcement programs the authors found both types serving as environmental enforcement officers. Some programs were staffed with code enforcement officers, some with commissioned peace officers (police officers, sheriff’s deputies, and constables).

The use of a commissioned peace officer is typically the preferred approach since the peace officer is able to carry a weapon and has the ability to make arrests. An additional advantage is that a police officer in uniform, carrying a weapon, lends credibility to the position and speaks to the seriousness of the violation and the importance of the program in general. In visiting with several cities that use code enforcement officers, they have arranged with their local police department to have peace officers made available to assist in arresting illegal dumpers. The concern with this type of arrangement is that the peace officers may not be available in a timely manner, thereby reducing the effectiveness of the code



Case Study: Going Undercover to Fight Illegal Dumping

Proactive measures can often be very successful in the fight against illegal dumping. In 2000, Tim Thompson, Wildlife Biologist in Johnson County, Iowa, in association with the DNR’s conservation officers set up a sting operation in an area of Johnson County known for illegal dumping.

Posing as hunters in search of game, Mr. Thompson and company stationed themselves near the chronic illegal dumpsite. As soon as an illegal dumper would drive up and begin to unload material, Mr. Thompson would radio DNR conservation officers who were stationed out of sight to write the individual a citation.

This undercover operation was very successful, with over 22 illegal dumpers cited. Mr. Thompson is a proponent of proactive measures such as this to combat illegal dumpers. He also acknowledges that efforts need to be made regionally, because once an illegal dumper realizes an area is “cracking down” they will move to other areas.

Other proactive “undercover” type operations that have been used to fight illegal dumping are night stakeouts, and surveillance equipment.

³⁰ A code enforcement officer is **not** a commissioned peace officer and is therefore not able to carry a gun, nor can he arrest an illegal dumper. In some cases they may not be able to issue a citation.

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enforcement officer. The authors found that the City of San Antonio's environmental enforcement program is staffed within the Code Compliance Department, however the environmental enforcement officers are commissioned peace officers.

The authors would recommend that whenever possible, commissioned peace officers be used as the environmental enforcement officers due to their ability to carry a gun and make arrests. If an environmental enforcement program cannot staff the enforcement officer's position with a commissioned peace officer, then it is recommended that the environmental enforcement program have a very clear policy with the local police department, sheriff's department, or constable's office regarding back-up support and its ability to be provided in a timely manner to assist in the arrest of illegal dumpers.

Use of Circumstantial Evidence in Illegal Dumping Cases

Although not directly include in the Iowa Code, evidentiary common law allows for the use of circumstantial evidence to be used in illegal dumping cases. For example, information, such as mail with a person's name on it or a name from a license plate registration, can be used as circumstantial evidence in some cases. Circumstantial evidence means that the person identified from the mail or license plate could have committed the violation. Through interviews with city/county environmental enforcement staff, prosecutors have used circumstantial evidence to help gain convictions against illegal dumpers. It is important to note that in some cases use of this argument alone may not be enough to gain a conviction.

The Attorney General's Office commented that the success of circumstantial evidence in gaining a conviction is based on the rest of the evidence in the case and alone is often not enough to go to court (ie. with only evidence such as a name from a license plate registration.) However, by having circumstantial evidence, along with other evidence, the probability of obtaining a conviction is enhanced.

Litter Control Officers

Another option to consider for enforcing illegal dumping laws is a county litter control officer. Several counties in the State of Iowa have started programs using volunteers litter control officers to control illegal dumping problems. Litter control officers are commissioned and have the responsibility to identify, document and develop cases against illegal dumpers. These officers can cite dumpers for violation of local ordinances or state illegal dumping laws.



Case Study: Eye in the Sky

Many times large scale illegal dumping operations do not occur along the roadside or areas that are easily accessible for law enforcement to investigate. One option that has been used with some success around the country is the use of aircraft to survey areas of large tracts of land or suspected areas of illegal dumping.

The use of aircraft has been used in the investigations of "Meth Labs" in Marion County, Iowa as well as various entities in Texas.

Aircraft can be useful in surveying large spaces in a relatively short period of time, investigators can inspect the "back 40" of a suspected illegal dumper's land, as well as get photographs from a birds-eye view.

Disadvantages of the aircraft investigations include, many small illegal dumpsites can go unnoticed, because the distance from the airplane to the physical dumpsite is quite far.

*Local governments can contact their local chapter of the Civil Air Patrol, the Airwing Unit of the Iowa State Patrol or contact a civilian pilot who might be interested in helping out in the battle against illegal dumping. **More information on aircraft assistance is located in Section 2.***

Q Did you know? Iowa is the only state that is bordered by two navigable rivers, illegal dumping in those rivers not only hurts the environment, but business and tourism as well.

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Although litter control officers serve as volunteers, they still need to have experience and training in the enforcement of illegal dumping laws. The person should either have a law enforcement background or be capable of getting the training needed to qualify as a county deputy.

Part-time Versus Full-time Enforcement Officers

Whenever possible, the authors would recommend that the environmental enforcement officer's position be a full-time position, rather than a part-time (half-time, quarter-time, etc.). The authors have found that when an environmental enforcement officer's time is split between environmental

The most important issue is that the environmental enforcement officer be staffed in a position that will allow him/her to maintain a close working relationship with the prosecutor

enforcement and code enforcement or other duties, that the environmental enforcement program suffers. While some smaller counties might argue that the hiring of a full-time environmental enforcement officer is not economically feasible, and a part-time officer is the only viable method, the

authors would strongly encourage the county to find a way to finance the full-time position. The benefits received from hiring a full-time versus part-time person will more than out-weigh the incremental expense associated with hiring a full-time person. Benefits received include: more time spent responding to illegal dumping reports, more time educating the public, more time in the field investigating illegal dumpsites, and more time conducting surveillance.

Location of Environmental Enforcement Officers

Another issue that must be resolved by the local community is where in the local government's organizational structure should the officer be staffed. As mentioned in Section 2 Management Structure, cities and counties have staffed these individuals within the code enforcement department, police department, health department, sheriff's department, etc. There is not a "right or wrong" answer with regard to the location of the environmental enforcement officer within the local government as long as illegal dumping is made a priority. The most important issue is that the environmental enforcement officer be staffed in a position that will allow him/her to maintain a close working relationship with the prosecutor (county attorney, district attorney, city attorney, etc.). As will be discussed in the following paragraphs, a key factor in maintaining an effective enforcement program is the ability of the enforcement officer and prosecutor to work together in bringing about the conviction of illegal dumpers in a timely manner.

Survey Analysis: DNR Illegal Dumping in Iowa – Response Rate

In the 2002 Illegal dumping survey conducted by the Iowa Department of Natural Resources over 46 percent of cities and counties who received a survey responded.

A response rate of 46 percent on a survey is very significant for policy makers and agency staff. Even though not all respondents felt that illegal dumping was a severe problem, due to the high response rate policy makers know it is a topic on the mind of local government officials.

Surveys which measure an attitude or perceptions of individuals is a good "measuring stick" for policy makers to see if citizens or in this case governments would like to see change in that area. This type of exploratory research is commonly used as a "building block" for further research or discussion on the topic. By completing surveys sent by universities or state agencies, you are able to have a voice in a quick and effective manner.

Q Did you know? With the possibility of placing landfill restrictions on E-waste in the future, E-waste has the potential of becoming a common illegally dumped item in Iowa.

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PROSECUTORS

In the authors' meetings with both environmental officers and prosecutors, it was found that in communities where there is a severe problem with illegal dumping, local prosecutors in those communities were usually unfamiliar with environmental laws and how to prosecute those arrested for illegal dumping.

Environmental enforcement officers said they find it frustrating when they arrest illegal dumpers, only to then have the case dismissed, due to the low priority given these types of cases, or because the prosecutor is unfamiliar with the law as it pertains to illegal dumping. Listed below are a number of recommendations, with regard to the role of the prosecutor, that the authors would offer to any city or county considering the establishment of an environmental enforcement program. Any prosecutor, especially those new to environmental law, is strongly urged to take advantage of the resources described below.

Sample Pleadings and Other Legal Documents

One of the biggest challenges for prosecutors unfamiliar with environmental law is finding the time to do the legal research. If sample copies of pleadings, motions, etc., from prior environmental cases, are made available to the prosecutors, those documents would be of great benefit in helping them to prosecute environmental crimes.

Prosecutors Knowledgeable in Environmental Law to Serve as References

Several prosecutors in the State of Iowa have an extensive background of experience in prosecuting environmental crimes. Two of these attorneys have offered to help answer questions that prosecutors who are new to environmental law may have with regard to the prosecution of environmental cases. These prosecutors include:

- **Mr. David Dorff, Assistant Attorney General, State of Iowa Attorney General's Office – Environmental Law Division, (515) 281-5351.**
- **Mr. Jon Tack, Attorney, Iowa Department of Natural Resources – Legal Services Unit, (515) 281-8889**

They are an excellent resource and one that any prosecutor new to environmental crime should use to assist them in strengthening their environmental law background.

Case Study: The Case Against Sham Recyclers

In the town of Durango, Iowa, Dennis Sharkey continues to operate an illegal junkyard while county officials and DNR staff continue their fight to shut his operation down.

Several complaints over the years have been filed by residents and area businesses who want his operation cleaned up.

Mr. Sharkey has been charged with 32 counts of zoning violations and has been sentenced to jail time and severe fines. Unfortunately, his case is on appeal in the Dubuque County District Court, so his illegal operation continues.

DNR staff members report that without a doubt Mr. Sharkey needs to be shut down due to zoning violations. DNR field office staff have also on several occasions seen burn pile traces where he has illegally burned various materials on his property.

Durango, a few miles northwest of Dubuque, is a heavily wooded area with a vineyard and winery as well as several creeks and riverbeds nearby.

Several articles chronicling the investigation are included in Appendix B.

Operations like Mr. Sharkey's are not only an eyesore but dangerous to water supplies as well. These illegal junkyards require a concerted effort from DNR staff, sheriff's department and county officials to make sure they clean their act up.

🔍 *Did you know? The West Nile Virus is carried by mosquitoes, who breed in stagnant water collecting in scrap tires.*

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Prosecutor(s) Specialized in Environmental Law

Due to the fact that many prosecutors are not familiar with environmental law, the authors would propose that local governments consider having one prosecutor or a team of prosecutors (two or three) designated as the prosecutors responsible for handling environmental cases. Once they have received the proper training they will be capable of handling the environmental cases within their respective community. Depending on the number of cases, it may be determined that only one attorney needs to be trained in environmental law. The local government may also decide that having a team of attorneys familiar with environmental law is more time effective. For instance, in Palm Beach County, Florida, Ms. Gwen Key, Assistant State Attorney, specializes in environmental crimes, but also handles stock fraud, insurance fraud and travel agency fraud cases. In California, rural counties are served by a “circuit prosecutor” to assist in prosecuting environmental crimes.

JUDGES/COURTS

It is important that the judges hearing the environmental cases be educated as well. One prosecutor mentioned during his interview with the authors that he had to educate some of the judges he presents his environmental cases before, due to their unfamiliarity with environmental law. The prosecutor mentioned that when he brings an environmental case before one particular judge, who he helped

Case Study: Shelby County Environmental Court

Judge Larry Potter presides over the Shelby County District Court, the first court in the United States dedicated to environmental cases. The court travels to different areas of the county hearing illegal dumping cases in various venues and has been the template for numerous other environmental courts.

Judge Potter measures his success not only by the number of cases tried, but also by the number of cases he has deterred. Judge Potter believes that by establishing an environmental court, potential violators who become aware of the court will be deterred due to the realization that resources dedicated to fighting illegal dumping have been provided so as to ensure the conviction of illegal dumpers.

The Shelby County Court was established in 1983, and hears illegal dumping cases once a week. Judge Potter was extremely receptive to the idea of a regional environmental court, and does not believe that a court with regional jurisdiction exists in the United States.

While communities in Iowa might not need to establish an “environmental court”, educating judges in the importance of environmental crimes is an essential part in not only ensuring the laws against illegal dumping are followed but also encouraging enforcement officers to cite and investigate illegal dumpers.

“educate,” the judge is now familiar with environmental law and is known for being “tough” on those people guilty of environmental crimes. The importance of educating the judges cannot be underestimated. In recent years a municipal judge in Dallas, Texas wrongly dismissed hundreds of dumping-related citations because he said they should have been filed in state court.

Typically it is the prosecutor that must educate the judge, since he/she is the one bringing the cases before the judge. It appears that the most successful methods for educating a judge are by providing them with citations to the law and being available to answer their questions. The authors would propose that the judge also be provided with information about the environmental law training sessions described below and when they are being held so the judge can attend.

Judges may also respond to financial impact data on the costs of illegal dumping and the need to recoup some of the costs from violators.

While most environmental cases are heard in a typical “court” setting (i.e., before a judge or justice of the peace), some cities have established an administrative hearing process to hear only environmental cases. This has allowed those communities to speed up the legal process in pursuing these cases. Cities and counties that have this type of

❓ *Did you know? Based on the 2002 DNR Illegal Dumping Survey, over half of the respondents felt that the State of Iowa as well as local governments could do MORE to address the problem of illegal dumping.*

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hearings process are listed in Appendix C. In addition, some cities have established “environmental courts” where the case is still heard by a judge, but a certain day is set aside to hear only environmental crimes. This guarantees that the environmental cases will not get placed on the “back-burner” in favor of pursuing other criminal cases which are perceived as a “higher priority.”³¹

Keep America Beautiful has materials to assist in the establishment of environmental courts, including brochures, a video, and information on their website at www.kab.org. Their web site provides information on how local governments can establish their own environmental courts. More than 25 American communities³² have established environmental courts. Their dockets are reserved exclusively for violations of local health, safety, housing, building, fire, solid waste and litter ordinances.

LEGAL ISSUES

Statutes Related to Illegal Dumping

In our interviews with environmental enforcement officers and prosecutors (county and district attorneys) the authors found that people cited for illegal dumping in Iowa are typically prosecuted in criminal court or sued in civil court under the terms of either Chapter: 321: Motor Vehicles and Law of the Road or Chapter 455B: Jurisdiction of Department of Natural Resources. Included as well is information on other areas of the code under which illegal dumping can be prosecuted.



Drive through citizen collection station provide county residents with an easy disposal option for their residential waste which might otherwise be illegally dumped.

Chapter 321 includes information regarding litter and illegal dumping along the highway or roadways.

- §321.369: Prohibits material from being dumped on the highway.
- §321.370: Determines that any person who illegally dumps shall remove it or be subject to penalties.
- §321.460: Mandates that all vehicles carrying material, except hay or stover, be secured from flying off.

Chapter 455B focuses on defining illegal dumping and littering and the duties and powers of law enforcement personnel, including:

- §455B.186: Prohibits pollutants from being discharged or dumped into any water of the state.
- §455B.307A: Describes the civil penalties associated with a person discarding solid waste.

³¹ The City of Chattanooga, Tennessee operates a court where environmental cases are heard by a judge every Thursday afternoon.

³² For an updated list of these communities, contact Keep America Beautiful at (203) 323 – 5987 to request a copy.

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- §455B.307: Describes the civil penalties associated with an individual, business or public agency dumping solid waste.
- §455B.363: Defines the crime of littering solid waste.
- §455B.364: Defines the penalty for littering.
- §455B.466: Provides the authority for the district attorney to seek civil penalties for hazardous waste dumping
- §455D.9: Prohibits disposal of yard waste. Civil penalties may be imposed pursuant to §455B.
- §455D.10: Requires all businesses selling new lead acid batteries to be willing to take back used lead acid batteries.
- §455D.11: Prohibits the dumping of waste tires. Civil penalties may be imposed pursuant to §455B.
- §455D.13: Prohibits waste oil from being disposed of in a sanitary landfill.



Dumpers who illegally dispose of construction and demolition debris can be prosecuted and in some cases be subject to serious fines.

Chapter 461A and 462A focus on littering or dumping on public lands or waterways.

- §461A.43: Describes the penalties associated with littering on public grounds.
- §462A.12: Prohibits the disposing of litter in public waters or ice.

Chapter 556B.1 discusses the procedure of removing junked cars and mobile homes.

- §556B.1: Describes the process for removing junked vehicles.

Chapter 716 discusses illegal dumping as well as other criminal acts such as vandalism on railroad property.

- §716.10: Describes the crime of illegal dumping and other acts on railroad property.
- §716.4: Outlines the punishment for criminal mischief in the second degree.
- §716.5: Outlines the punishment for criminal mischief in the third degree.
- §716B.2: Describes the crime of disposing of hazardous waste.
- §716B.3: Describes the crime of transporting hazardous waste unlawfully.

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- §716B.4: Describes the crime of storing and treating hazardous waste unlawfully.
- §716B.5: Authorizes the county attorney to enforce these offenses.

Chapter 727 discusses the dumping of white goods.

- §727.3: Prohibits the dumping of certain white goods, subject to penalty.

Appendix D includes a detailed description of each of these sections.

Deciding Between Criminal and Civil Venues

As established in state law, the option exists to pursue illegal dumping crimes in either criminal or civil court. The decision to pursue cases criminally or civilly can depend on a number of factors.

Reasons to prosecute cases criminally include:

- **DEFENDANT MAY REACT MORE SERIOUSLY TO CRIMINAL CHARGES THAN TO A CIVIL ACTION.**
- **PROSECUTOR CAN SEND A LETTER TO THE DEFENDANT, ADVISING HIM THAT HE HAS 30 DAYS TO CLEANUP THE ILLEGAL DUMPING BEFORE THE PROSECUTOR WILL FILE CRIMINAL CHARGES.**
- **CONVICTIONS WILL BE PLACED ON THE DEFENDANT’S RECORD.**

Reasons to file civil actions include:

- **CAN RECOVER LARGER MONETARY DAMAGES THAT CAN BE USED TO CLEANUP ILLEGALLY DUMPED WASTE.**
- **CAN REQUIRE THE DEFENDANT TO CLEANUP THE ILLEGAL DUMPING.**
- **THE BURDEN OF PROVING A CASE IS NOT AS STRINGENT AS IS IT IS FOR A CRIMINAL CASE.**
- **IN FOLLOWING RULES OF CIVIL PROCEDURE, DEFENDANT HAS SEVERAL OPPORTUNITIES TO CLEANUP THE ILLEGAL DUMPING BEFORE HAVING TO GO TO COURT.**
- **IN CASES WHERE A DEFENDANT DOES NOT COMPLY WITH A JUDGMENT, THE JUDGE CAN STILL ORDER THE DEFENDANT TO SERVE TIME IN JAIL.**
- **A JUDGE, NOT A JURY, WILL HEAR THE CASE.**
- **DEFENDANT MUST OBTAIN HIS OWN LEGAL COUNSEL.**

Regardless of whether a case is pursued in a criminal or civil court, there is a need to thoroughly prepare the case.

For those cases where there is a large illegal dumpsite that is a chronic problem it may make sense to prosecute those cases in both a criminal and civil venue. The civil fines can be substantially larger

Did you know? For rural areas, an effective educational program can be implemented for under \$4,000 per year annually. For more information, see Appendix A.

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than criminal fines, and the prosecutor is able to obtain a court ordered injunction with regard to the illegal dumping activity. In addition, local prosecutors can try the case in criminal court to obtain a jail sentence or other fine. For example, the authors were told by a prosecutor that in a hypothetical case of a homebuilder that was hauling construction scrap to an illegal dumpsite, the prosecutor would probably prosecute that case in a criminal venue so one could obtain a court ordered injunction to close down the illegal dumpsite and then seek restitution in civil court from the homebuilder to assist in the monetary costs associated with cleaning up the illegal dumpsite. Corporations caught illegally dumping materials may prefer to be prosecuted in a civil venue, even though the fines can be higher, in order to avoid a criminal record.

Corporations caught illegally dumping materials may prefer to be prosecuted in a civil venue, even though the fines can be higher, in order to avoid a criminal record.

The authors would recommend that local governments prosecute the cases under whichever venue will be the more effective in acting as a deterrent to future illegal dumping by the individual or company charged. To the extent that these cases are publicized, the publicity will let other potential illegal dumpers know that the local government is serious about prosecuting offenders.

TRAINING RESOURCES

In other states, agencies have developed, funded and promoted environmental law training sessions. These sessions provide a valuable tool for training the environmental enforcement officers as well as the prosecutors. Ten years ago, a prosecutor would have had a difficult time finding an environmental law training session. However, due to the increased awareness with regard to environmental crimes, there are a number of agencies that are now sponsoring environmental law training sessions. These sessions can also explain why there is a need for enforcement of these laws. In many cases, the legal staff and judiciary are not familiar with the laws, and are not familiar with why enforcement is important.

Ten years ago, a prosecutor would have had a difficult time finding an environmental law training session. Now, there are a number of agencies that are sponsoring environmental law training sessions.

Sources of information regarding environmental law and related environmental law training sessions are listed below. For those local communities establishing an environmental enforcement program, the authors

recommend obtaining some of the materials listed below. The local government should also budget for key individuals within their local government's enforcement program to attend an environmental law training session, similar to the ones listed below.

- *National Enforcement Training Institute* – The mission of the National Enforcement Training Institute (NETI), which is a part of the U.S. EPA, is to train federal, state, local and lawyers, inspectors, civil and criminal investigators, and technical experts in the enforcement of the nation's environmental laws. Courses are available electronically and in locations throughout the United States. There is no charge for courses. Information about NETI can be accessed on the Internet at <http://www.epa.gov/compliance/training/neti/> or (800) EPA – NETI.

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- *Environmental Court Video* – This video explains the role and structure of an environmental court and comes with a brochure on environmental court planning. It is prepared by Clean Tennessee (an affiliate of Keep America Beautiful). Contact: Keep America Beautiful, (203) 323-8987 ext. 9199.
- *Video Training Library; Southern Environmental Enforcement Network (SEEN)* – This video series is used extensively by environmental enforcement personnel. SEEN is a consortium of governmental agencies from 11 southern states. They have a newsletter, and many video resources. Contact: (205) 242-7369.
 - *Environmental Crimes Awareness for Law Enforcement* - This video is an introduction to environmental crimes and features several scenarios to illustrate the role of local law enforcement officers in the detection of environmental crimes.
- *Illegal Dumping: Victimized Texas* – This video documents basics that enforcement officials need to know. It explains elusive illegal dumping problems, probable locations, etc. The video was funded in part by a Texas Commission on Environmental Quality (TCEQ) grant and produced by the Lower Colorado River Authority (800) 776-5272.
- *Harris County Precinct 3 Environmental Enforcement* – This video describes the unique illegal dumping problems found in Harris County. It also explains the role of the environmental enforcement officer. This video was funded in part by the TCEQ and produced in conjunction with the Houston-Galveston Area Council (H-GAC). Contact: K&K Media, (713) 495-3691.
- *Leaving Nothing But Your Tracks* - This video describes some of the issues facing Fort Bend County, Texas with regard to illegal dumping. The video explains the process for handling the prosecution of someone arrested for illegal dumping (arrest, filing of charges, court hearing, sentencing, etc.). The video is targeted toward junior high school students and above, including adults. This video was funded in part by the TCEQ and produced in conjunction with H-GAC. Contact: Troy Scalco, Fort Bend Environmental Health Department, (281) 341-4620.
- *Illegal Dumping: Possible Solutions, Oklahoma Cooperative Extension Services*- This 20 minute video discusses the pros and cons of trash collection systems that can help reduce, perhaps even eliminate, the problem of illegal dumping. The video is geared mainly toward addressing the issue of illegal dumping in rural areas. Contact: Oklahoma State, Oklahoma Cooperative Extension Services, (405) 744-4050
- *Legal Aspects of Solid Waste Enforcement, Cameron County District Attorney's Office* – Partially funded by a grant from the TCEQ, this environmental law enforcement training course targets county judges and enforcement officers who work with solid waste and litter abatement cases. This course focuses on the major environmental protection statutes of solid waste enforcement. Contact: Cameron County District Attorney's Office, (956) 399-3679.

The above listing should not be considered to be a comprehensive listing of potential resources. While several of these training resources may reference specific statutes for other states, they can still serve as a valuable, yet general, resource for environmental enforcement professionals in the State of Iowa.

🔍 *Did you know? Increasing and enforcement of fines for illegal dumpers by sizable margins can lead to decreases in the amount of illegal dumping seen around the city or county.*

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NETWORKING

It is important that all individuals involved with the enforcement and prosecution of illegal dumpers remain current with regard to the State of Iowa's environmental laws. Local environmental enforcement personnel should also network with personnel managing other environmental enforcement programs in order to learn about new strategies or approaches that have proven effective in battling illegal dumpers. Listed below are several groups that would be beneficial to contact. They are as follows:

1. **Solid Waste Planning Agencies** – Environmental enforcement personnel should keep in touch with their district's solid waste planner. Contact information is provided in Appendix F.
2. **Iowa Department of Natural Resources** – Environmental enforcement personnel should also stay in touch with the appropriate DNR personnel in order to be kept abreast of any changes in the enforcement of the state's environmental laws. Contact information is provided in Appendix F.
3. **Other Environmental Enforcement Programs** – Environmental enforcement personnel (enforcement officers, prosecutors, judges) should keep in touch with their counterparts at other "successful" environmental enforcement programs. This will allow the personnel to benefit from any lessons learned at more experienced programs.

SYNOPSIS

- Enforcement and prosecution is an essential component of program success. Unless illegal dumpers face the real threat of being caught and punished, their behavior is unlikely to change.
- Environmental enforcement officers should be trained in environmental laws and have good communications and investigative skills. Full-time commissioned peace officers are preferred.
- Lack of effective prosecution is often a consequence of prosecutors being unfamiliar with environmental law. Many resources are available to remedy the situation including sample pleadings, environmental law training sessions, and advice from experienced environmental prosecutors.
- Judges are often unaware of the important role courts play in deterring illegal dumping. Prosecutors who are familiar with environmental law may be useful in educating judges.
- Some communities establish environmental courts or designate certain prosecutors as specialists in environmental law to assist in the effective prosecution of illegal dumpers.
- Environmental cases may be tried in both criminal and civil courts.
- Extensive training materials are available including workshops, videos, and publications.
- Effective programs involve active networking with other programs and pertinent professional organizations.

SECTION 5 – CLEANUP

INTRODUCTION

One of the key steps in maintaining a successful environmental enforcement program is making sure that the local government has an effective policy with regard to the clean up of illegal dumpsites. It is important that the sites be cleaned up in as timely a manner as possible since trash left onsite attracts additional illegal dumping. The cost of cleaning up illegal dumpsites can be very expensive. In Dallas, Texas, an illegal landfill operation accepted waste from August 1994 to the fall of 1996. The site has now been closed; however, it is projected that it could cost \$20 million to cleanup about two million tons of waste at the site.³³ While this may be a rather extreme example, it points out the importance of making sure that illegal dumpsites are not allowed to flourish in a community.

In Dallas, Texas, an illegal landfill operation is projected to cost \$20 million to cleanup the two million tons of waste at the site.

The purpose of this section is to present environmental enforcement programs with a number of options to consider in establishing policies with regard to the clean up of illegal dumpsites. In visiting with environmental enforcement program managers, the authors found a number of different approaches used to handle cleanups. These various options will be discussed below. This section will also address how to keep these sites free of illegally dumped waste. Finally, this section will discuss some of the funding mechanisms available for financing cleanups and will provide some case studies concerning cleanup programs in other parts of the United States.

CLEANUP METHODS

Community Cleanups – Volunteers

One option that is often used when there is limited funding available to clean up illegal dumpsites is the use of volunteers to do the actual cleanup. While this is a less costly method, it also requires a greater degree of preparation on the local government's part with regard to planning the event (issuance of announcements, coordinating the volunteers, finding corporations to contribute tools and equipment, etc.).³⁴



Illegally dumped items like this drum can often contain unknown hazardous chemicals that have the potential to spill or leak into the ground.

When working with volunteers, it is critical to emphasize safety issues. It is important that the volunteers are educated with regard to the proper procedures for collecting solid waste. For instance, it is vital to explain that if they discover what looks like a potentially hazardous waste material (55 gallon drums, containers filled with liquids, etc.) that they not touch those items, but let a professional handle those materials. Volunteers should also understand that they

³³ Refer to Appendix E, Article 5.

³⁴ Either the local government or a local community group/civic organization may coordinate the community cleanups. These types of cleanups have been successfully completed using both types of organizations to coordinate the cleanup.

SECTION 5 – CLEANUP

should not try to collect any materials that could potentially place them in a harmful situation or cause injury. For example, volunteers should not try to collect heavy items or dangerous materials such as sharp metal or broken glass.

Sources for volunteer labor can often be obtained from youth or civic organizations, as well as environmental groups located within the community. Senior citizens have also been very valuable and found to be a great asset in combating illegal dumping. Equipment (bags, rakes, gloves, shovels, etc.) can usually be borrowed from the local government or individuals can bring their own tools. Funding for the disposal of the waste materials collected can usually be obtained either from the local government or through corporate donations. Often the local landfill or transfer station will provide a one-day exemption from tipping fees for all waste brought in during the “cleanup day” by the organization coordinating the cleanup.

The Texas Commission on Environmental Quality has developed a planning guide that can be used by communities that are organizing events to help in litter clean up, pollution prevention and illegal dumpsite cleanups. Any local government or community group considering the cleanup of illegal dumpsites with volunteers should obtain a copy of this guide.³⁵

Local Government Crews Conduct Cleanups

The most common method of cleaning up illegal dumpsites is the use of a local government’s own personnel and equipment. Most cities and counties that operate environmental enforcement programs typically budget a certain amount of money for disposal costs associated with the cleanup of illegally dumped waste. If the environmental enforcement program is part of a county government, it is usually the county’s road crews that are responsible for cleaning up illegal dumpsites. The disadvantage of this form of cleanup is that it often receives a low priority because the road crew’s primary responsibility is to repair and maintain the county’s roads and bridges. This can result in a low emphasis being placed on the cleanup of illegal dumpsites, which in the long-run may cost the county more money since illegal dumpsites that are not cleaned up will attract additional trash. Within city governments the individuals in the public works department or sanitation department are often used to perform cleanups. In general, while city crews tend to place a greater emphasis on cleaning up illegal



Case Study: City of Des Moines, Public Works Department

The City of Des Moines is the largest metropolitan area in the state of Iowa, and has experienced illegal dumping in various areas of the city in the past.

In the above picture Mr. Bill Stowe, Public Works Director, stands in front of barricades the public works crew has placed in front of an abandoned street that has been known for illegal dumping. Signs have been posted in the area to warn of the fines which can be assessed if caught illegally dumping. Mr. Stowe has also increased lighting in various areas to ward off illegal dumpers.

Mr. Stowe reports that the majority of the dumping in Des Moines occurs in the more industrial part of town. City crews patrol these areas daily and pick up illegally dumped items. Mr. Stowe approximates there are about 12 “hot spots” around the city where illegal dumping is very prevalent.

Of the \$11 million dollars that was dedicated to solid waste in 2002, \$250,000 was committed public property clean-ups. These clean-ups range from white goods, scrap tires, construction and demolition debris to household waste.

³⁵ *Texas Environmental Event Planning Guide*, TCEQ (G1-157), September 1998. Call (512) 239 – 0028 to request a copy.

SECTION 5 – CLEANUP

dumpsites, cities also run the risk of having illegal dumpsites not cleaned up if those individuals are too busy with other responsibilities.



The Broken Window Theory

Many times, run down or abandoned buildings are a magnet for illegal dumpers. This phenomenon known as the broken window theory is widely accepted by many environmental enforcement staff around the country.

Mel Pins, Environmental Specialist at the Iowa Department of Natural Resources, has had a great deal of experience with illegal dumping and is a strong believer in this theory.

Local governments must work to keep illegal dumpsites clean to prevent the dumping of more items in the area. The City of Des Moines, Iowa has determined, and regularly inspects illegal dumping “hot spots” to prevent more illegal dumping from occurring.

If the local government is going to have its own personnel cleaning up illegal dumpsites, it is imperative that the local government either dedicate crews to this sole responsibility, or at least designate individuals who are assigned on a part-time basis to cleaning up the illegal dumpsites. To have a truly successful environmental enforcement program, the local government must make the monetary commitment and assign personnel to the clean up of illegal dumpsites. The cleanup of these sites needs to be a priority, rather than something to do when the city or county employees have “nothing else to do.”

Finally, it must be made clear from the start of the program that clean up is not the responsibility of the environmental enforcement officer. In at least one case the authors reviewed, this lack of clarity led to misunderstandings and conflict between the officer and the cleanup crews.

Cleanups Mandated by Conviction

A number of local governments have used other sources of labor to cleanup their illegal dumpsites. Some local governments require that people caught illegally dumping, in addition to paying a fine, must also serve a set number of hours (also called “community service”) cleaning up illegal dumpsites.

Some cities and counties have used prison labor from the local city or county jail. These same entities have also used individuals who are required to complete a certain number of community service hours as part of their sentencing for DWI or other crimes.

KEEPING SITES CLEAN

Once the sites are cleaned up it is important that the local government keep these sites free of illegally dumped materials. The “broken window theory” states that property that is not maintained fosters and attracts illegal dumpers, as well as other types of criminal activity.

Obviously, for many of the rural counties it is rather difficult to keep all dumpsites cleaned up because of the “limitless” number of places in the rural county where waste can be dumped illegally. However, there are certain actions that even rural counties can take in an effort to reduce the amount of illegal dumping and to keep chronic dumping sites clean. These actions are as follows:

🔍 *Did you know? Once illegal dumping is addressed in an area, often the problem will shift in to other neighboring communities.*

SECTION 5 – CLEANUP

Posting of Signs

Perhaps one of the most cost-effective approaches is to post signs stating “No Dumping Allowed.” The signs should also state the amount of the fine associated with illegal dumping, and if there is room, the sign should state where waste may be taken to be disposed of properly.

Lighting

For those areas that are chronically subject to late night dumping or “midnight dumping,” providing streetlights in these areas can greatly assist in reducing the amount of dumping. Lighting increases the chances of the illegal dumper being seen and his license plate number being obtained, or vehicle identified.³⁶ This action to battle illegal dumping is most cost effective for cities versus counties due to the expense associated with installing streetlights.

Barriers

Another option is for the local government to install barriers that prevent the illegal dumper from obtaining access to areas that have been convenient dumpsites. Examples of barriers would include highway dividers, fences, and landscaping. One county has even considered fencing off certain rural roads on which no one lives and that are currently only used to illegally dump waste.

Education

The importance of education in reducing illegal dumping has already been discussed in Section 3 Education. However, it is important to re-emphasize that by educating the general public as to the importance of reporting any observed illegal dumping activities the citizens can help in keeping chronic dumping sites clean. The use of senior citizens can be especially helpful since they tend to spend more time at or near their homes.

Surveillance Cameras

Some cities and state agencies have placed video cameras near known illegal dumpsites to record acts of illegal dumping. The City of Waterloo, Iowa has placed surveillance cameras in alleyways which are know illegal dumping “hot spots” to monitor illegal dumping activity. Although no citations or convictions were made this is an example of how surveillance cameras can be used to combat illegal dumping.

Case Study: The State of Kentucky

The Kentucky Natural Resources and Environmental Protection Cabinet (KNREPC) was one of the first public agencies in the United States to use surveillance cameras to deter illegal dumping.

The State of Kentucky places cameras in chronic illegal dumping locations, and uses photos to track down suspects. The agency has a good track record of being able to identify suspects using photos from the surveillance cameras.

Photos also serve as a strong deterrent, as the KNREPC posts pictures of suspected illegal dumpers on the agency’s web site.

<http://www.environment.ky.gov/nrepc/dumpers/dumpphotos.htm>

By knowing that cameras could capture those engaging in illegal dumping activities, people are looking for legal options to dispose of their garbage.

³⁶ *Illegal Dumping Prevention Guidebook*, U.S. EPA Region 5, March 1998, p.17.

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Another concept has been to provide residents with disposable cameras so they can be used to photograph illegal dumpers.

Legal Action Against Property Owners

Injunctions against property owners should be considered for those sites on private property that are chronic sites of illegal dumping. The financial rewards to a property owner for operating an illegal site may be such that a periodic fine is not enough to keep them from allowing illegal dumping to continue on their property. Therefore, injunctions may be necessary to ensure that not only is a fine imposed, but that the dumping activity is curtailed. For example, the City of Sioux City, Iowa sends letters to property owners where illegal dumps were located. In these letters, the city explained that the landowners needed to cleanup the dumps. Because the property owners who received the letters complied with the city's request, further legal action was avoided. Some local governments, including Jefferson County, Missouri, have sold properties in cases where illegal dumpers have not complied with court orders for cleanups.



Scrap tire piles like the one pictured above are a haven for disease carrying pests such as rats and mosquitoes.

Fine Illegal Dumpers

One of the best ways to prevent future illegal dumping is to impose significant fines on those individuals caught illegally dumping. It has been confirmed by numerous cities and counties that once an environmental enforcement program gets the reputation for fining illegal dumpers (with significant fines, not \$50 or \$100), and/or confiscating their vehicles, illegal dumping activity will decrease significantly.³⁷

“We have been very successful in gaining support for combating illegal dumping from groups like the Metro Waste Authority, our 43 established neighborhoods, and television stations like Channel 8.”

Bill Stowe, Public Works Director – City of Des Moines, IA

If any waste is illegally dumped near areas where signs have been posted it is important that the waste be picked up as soon as it is identified. If the waste is left, it sends the message that people do not care about their community.

FUNDING OPTIONS

One of the biggest challenges to cleaning up illegal dumpsites is obtaining the necessary funds to finance the cleanup (labor, equipment, disposal costs, etc.). Listed below are some options that local governments may wish to consider pursuing. The authors would add that at this time, based on our interviews with environmental enforcement program managers, the primary source of funds for cleaning up illegal dumpsites will continue to be the local government's own financial resources. That means the funding will need to be typically provided either through the city or county's tax assessing powers, or utility fees.

³⁷ Illegal dumping will especially decrease if the first few convictions and fines are well publicized in the local newspaper.

SECTION 5 – CLEANUP

Local Funds

The primary source of funds for cleaning up illegal dumpsites will continue to be from the local government's own budget. However, in requesting these funds, the environmental enforcement program's manager should explain to the elected officials the benefits of cleaning up illegal dumpsites (health and safety considerations, reduction in criminal element, cleaner community, future savings by discouraging further dumping – which is expensive to cleanup, etc.).

Keeping Salvage Yards Cleaned Up

The Boone County Landfill, in Boone County, Iowa, sought to toughen up the permitting requirements for salvage dealers in the county by passing a county ordinance. This ordinance required salvage yards to be permitted by the county as well as the state.

Prior to the ordinance, salvage dealers were only required to receive a permit from the Iowa Department of Transportation, and salvage yards operated without gates, signs, or fencing leaving these areas ripe for illegal dumping.

Mr. Scott A. Smith, Landfill Administrator, believed that many salvage yards were fire hazards and wanted to stop the creation of an active nuisance.

The county held two public meetings on this issue which included speakers from the IDNR field office, Iowa Department of Transportation, Boone County Landfill, and Boone County Zoning and Health Department. This tactic gained a great deal of public support and many citizens left more informed about the hazards of improper solid waste disposal and salvage yards.

Since the ordinance's inception, Boone County's salvage yards have been cleaned up and are no longer sanctuaries for illegal dumping.

State Funds

Some states provide financial assistance for the cleanup of illegal dumpsites. In the State of Iowa, funds provided to local governments were used to clean up scrap tires in the area. The program, now ended, has left a legacy of communities that are aware and combat illegally dumped scrap tires in their community.

Supplemental Environmental Projects (S.E.P.)

Supplemental Environmental Projects occur when funds are made available through the negotiation of an enforcement settlement between a defendant, the Office of the Attorney General and the DNR. The funds can then be used to finance local environmental enforcement programs. While this program is not available in Iowa, it is one the state should consider implementing as a potential source of funding for local environmental enforcement efforts.

Other

Two sources of funds that people are often not aware of are Keep America Beautiful and solid waste planning authorities. Keep America Beautiful receives grant funds from various sources which are distributed to Keep America Beautiful affiliates to assist in funding public

education, concerning illegal dumping. Solid waste planning authorities, through their landfill divisions, can provide funds, typically to be used with regard to public education.

DEALING WITH HAZARDOUS WASTE AND OTHER DANGEROUS MATERIALS

When dealing with illegal dumping problems, environmental enforcement officers will frequently come into contact with unidentified materials that could be hazardous waste or other dangerous materials. The illegal dumping of hazardous wastes can be a problem because it can be expensive to properly dispose of these materials. Only properly trained professionals should handle or otherwise come into contact with any materials that could potentially pose a threat to their health and safety. Environmental enforcement programs should also coordinate efforts with local fire departments and

SECTION 5 – CLEANUP

emergency response units to determine standard procedures for dealing with hazardous materials. In addition, local governments can contact the DNR's Environmental Emergency Response Team for assistance.³⁸

Another related problem has affected several communities in the State of Iowa. These communities have experienced problems with the illegal dumping of chemicals or by-products used in making methamphetamines, which are synthetic amphetamines or stimulants that are produced and sold illegally. Environmental enforcement personnel in the state have encountered cleanup situations involving these illegal labs and chemicals.

When dealing with these types of cleanups it is essential to use properly trained personnel because of the following issues:

- **MAKING METHAMPHETAMINES REQUIRES THE USE OF POISONOUS, UNSTABLE, EXTREMELY FLAMMABLE INGREDIENTS.**
- **VAPORS THAT ESCAPE DURING THE COOKING PROCESS CAN BE FATAL.**
- **FIVE OR SIX POUNDS OF TOXIC WASTE ARE CREATED FOR EVERY POUND OF METHAMPHETAMINE COOKED.**

Hazardous Waste and Emergency Response Training

Hazardous waste and emergency response training is imperative to ensure the safety of individuals who might be in responding to illegally dumped hazardous materials. At a minimum, law enforcement personnel must be trained to the hazardous materials awareness level. This training is included as part of the curriculum at the Iowa Law Enforcement Academy for all new recruits. Law enforcement officials should strive to receive annual refresher training in hazardous materials.

Law enforcement, emergency management, fire fighters and other public officials may attend training seminars at community colleges or regional training centers. Emergency management officials can also apply for grants to bring the training to right to your county. Members of regional hazardous materials teams quite often provide this training to local officials within the response area for that team.

If city or county staff is interested in attending emergency response training, contact your local emergency management coordinator for further information about venues and dates of training seminars available in your area.

SYNOPSIS

- Cleanup of existing illegal dumpsites is integral to enforcement programs.
- Options for cleanup include the use of volunteers, city or county crews, prisoner or community service labor and/or the use of S.E.P.s to offset the cost of cleanup crews and materials.
- Methods for keeping sites clean include signs, lighting, barriers, education, and surveillance.
- The primary source of funding for cleanups is local government. Limited funds are available through dumping fines.

³⁸ Refer to Appendix F for information on how to contact DNR's Environmental Emergency Response Team.

Did you know? Over 75 percent of scrap tires recovered annually are turned into Tire Derived Fuel

SECTION 6 – PROGRAM ADMINISTRATION

INTRODUCTION

Once the environmental enforcement program is operational, there are four primary areas of responsibility that the manager of the environmental enforcement program (manager) will need to address on an on-going basis, in order to ensure the program remains a continued success. **These four areas of responsibility must be addressed on an on-going basis.**

The four primary areas of responsibility are as follows:

COMPLETION OF GENERAL ADMINISTRATIVE DUTIES AND TASKS

MANAGEMENT OF FINANCIAL RESOURCES

MONITORING OF KEY OPERATING ACTIVITIES

REVIEW OF OVERALL PROGRAM EFFECTIVENESS

In reading this section, the reader will notice that each of the areas of responsibility has a number of tasks listed beneath it. Based on the size of the environmental enforcement program, some of these tasks will need to be addressed on either a quarterly, monthly, or weekly basis. The authors have listed what the authors perceive to be the primary tasks within each of these four areas of responsibility. As individual cities and counties establish their own environmental enforcement programs, they will most likely need to add additional tasks to this list.

COMPLETION OF GENERAL ADMINISTRATIVE DUTIES AND TASKS

This area of responsibility describes the tasks which will need to be accomplished by the manager on an on-going basis to ensure the effectiveness of the environmental enforcement program. Most of these tasks entail making sure that all areas of the program (education, enforcement, prosecution, cleanup, etc.) are functioning smoothly and have not run into any “roadblocks” which would limit their effectiveness in accomplishing their various goals. As mentioned earlier, this is only a listing of the primary tasks, the reader will most likely need to add additional tasks to this list. The tasks are as follows:

- The manager will need to monitor the education program to ensure that all audiences are being educated, on a continual basis, about the adverse impact that illegal dumping has upon their community (health and safety issues, economic impact, crime, etc.).

These audiences will include:

ELECTED OFFICIALS

LAW ENFORCEMENT OFFICERS

CODE ENFORCEMENT AND HEALTH DEPARTMENT PERSONNEL

PROSECUTORS

JUDGES

**LOCAL ENVIRONMENTAL GROUPS (KEEP SIOUX CITY BEAUTIFUL,
ETC.)**

GENERAL PUBLIC

LOCAL MEDIA

Did you know? There are three major TDF users within the state: a cement kiln, grain processing plant, and the University of Iowa's power plant.

SECTION 6 – PROGRAM ADMINISTRATION

The importance of an effective education program cannot be over-emphasized. As mentioned in, Section 3 Education, the education program is on-going. An effective enforcement program will educate its citizens throughout the life of the program, not just in the “start-up” years. **An effective education program is one of the most important elements to the operation of a successful environmental enforcement program.**

- The manager must be sure that telephone calls from citizens about illegal dumpsites are being received at the proper location within the local government and are then routed in a proper and timely manner to the enforcement officers. The manager must also make sure that environmental enforcement officers respond promptly to the citizens’ calls.
- The manager must ensure that the environmental enforcement program is coordinated with the city or county’s comprehensive solid waste management plan. **In order to have an effective environmental enforcement program; citizens must know how to properly dispose of their waste. If the general public knows how to properly dispose of their waste, illegal dumping will decrease.**
- The manager must schedule on-going visits (unstructured) as well as meetings (structured) with all individuals involved in the program to make sure that all departments within the city and/or county are working together effectively in the battle against illegal dumpers. For instance, if the environmental enforcement officer’s cases are not being prosecuted by the county attorney, the manager must determine why, and help the two parties arrive at a solution. Any “friction” between the various departments within the city and/or county governments can result in the enforcement program’s effectiveness being hampered.
- On an on-going basis, the manager should review the existing operational procedures of the program to see if the program’s procedures need to be modified, or “tweaked” in order to maintain the program’s effectiveness.
- One of the manager’s key responsibilities will be to act as a liaison between the various departments within the various city and/or county governments to make sure that the environmental enforcement program continues to be an effective tool in combating illegal dumping.
- The manager must remain current with regard to any changes, or proposed changes, in the local or state regulations which could affect the local government’s environmental enforcement program.

Case Study: Prairie Solid Waste Agency Database

Leslie Goldsmith, Director, at the Prairie Solid Waste Agency has implemented an electronic database to track the amount of illegally dumped material brought into the landfill.

Illegally dumped material, which includes scrap tires, residential waste, and white goods, are cleaned up by county road crews and brought to the landfill free of charge.

Since the Prairie Solid Waste Agency does not charge a fee for the disposal of the waste, the costs associated for disposal are not recovered. Therefore, Ms. Goldsmith wanted to implement a tracking mechanism to trace the costs of disposing of the illegally dumped material.

The database, which started tracking material in 2002, has provided Union County, Iowa with data that not only identifies where the material is coming from but how much material is coming in. In the future, Ms. Goldsmith hopes this information will be useful to the board of supervisors or other cities in the tri-county area.

Databases can not only be used to track how much material is being brought in but can track where the material is being generated. This information can be invaluable for environmental enforcement efforts when combating illegal dumping.

Did you know? In communities around colleges or universities, increases in the amount of illegally dumped residential waste and bulky items are seen during “move-out” time in May.

SECTION 6 – PROGRAM ADMINISTRATION

MANAGEMENT OF FINANCIAL RESOURCES

- The manager will be responsible for creating an annual budget for the environmental enforcement program. This should include all budgeted costs associated with operating the program, both direct and indirect costs. This budget should include all of the costs to be incurred by the local government in operating the program (education, enforcement, prosecution, cleanup, etc.).
- At least once a year, the manager must determine the actual costs incurred with regard to the environmental enforcement program and compare the actual costs incurred with the budgeted costs that were projected at the beginning of the fiscal year. Depending on the size of the program, the authors would propose that the actual financials be updated quarterly, and possibly monthly. The more frequently the costs are updated, the sooner the manager will be able to identify any potential aberration in the costs of the program, and avoid any cost overruns, which could jeopardize the financial integrity of the program.



Illegal dumpers often utilize a remote or woody area to dump their material out of sight from any major highway or community.

- The authors would strongly encourage any local government that is considering establishing, or has already established an environmental enforcement program to use “full cost accounting” to determine the costs of operating the program. Appendix B provides an in-depth description of the full cost accounting methodology, showing how a local government may use the methodology to determine the annual costs of operating an environmental enforcement

“The rules of cities and counties can impact the illegal dumping problems in a nearby county. (Environmental enforcement) efforts need to be regionally coordinated.”

- Larry Gittens, Sanitarian, Warren County, IA

program.³⁹ The appendix also provides a set of detailed forms that can be used to determine the actual cost of the local government’s environmental enforcement program, using the full cost accounting methodology. During our survey of environmental enforcement programs (Appendix C), the authors found that the vast majority of the program managers did not have a clear idea as to what their program cost was in total.⁴⁰ The U.S. EPA has also developed several documents related to full cost accounting. These documents and other resources can be found on U.S. EPA’s web site at:

<http://www.epa.gov/epaoswer/non-hw/muncpl/fullcost/docs/epadocs.htm>

³⁹ The full cost accounting methodology described in Appendix B for determining the cost of operating an environmental enforcement program is consistent with the methodology developed by the authors for the TCEQ in the *Municipal Solid Waste Services Full Cost Accounting Workbook*, TCEQ, (RG-127), April 1995. A copy of this workbook (or any other TCEQ documents mentioned in this manual) can be obtained by calling the TCEQ at (512) 239-0028.

⁴⁰ The primary reason for not knowing the total program’s costs is that the programs typically use personnel and equipment from various departments within the city or county government and therefore the costs for these resources are “buried” within the budget for each department. Full cost accounting is a methodology used to identify those costs and determine the true cost of the environmental enforcement program.

SECTION 6 – PROGRAM ADMINISTRATION

- Using the budgeted versus actual costs for the program (as calculated using full cost accounting described in the previous two tasks), the manager should track the costs for each of the various “program categories” within the environmental enforcement program

A “program category” is defined as the following:

**EDUCATION
ENFORCEMENT OFFICERS
PROSECUTION/COURTS
CLEANUP
ADMINISTRATION
OTHER**

Using these program categories, the manager can then determine whether there are any significant aberrations between what is budgeted for a particular program category versus the actual costs incurred. For instance, if the environmental enforcement officer’s “actual costs” versus “budgeted costs” are significantly higher during the first quarter of the fiscal year the manager can visit with the officers to find out why these costs have increased. It may be that the local government is seeing an increase in the number of illegal dumping complaints received, resulting in more illegal dumpsites to be investigated by the officers, which is resulting in overtime. By using full cost accounting, these deviations in costs can be identified early on and addressed, thus avoiding a potentially significant budget shortfall.

- The manager should actively pursue any grant funds that may be available from the U.S. EPA, the DNR, the local SWMD, or any other governmental agency. These funds can be used to help in financing the environmental enforcement program. The local government may also partner with non-profit organizations to receive grant funds from private and foundation sources, especially for education programs. However, the manager, as well as the elected officials of the local government must realize that government and non-government grant funds are typically provided to help “start-up” an environmental enforcement program, or expand the services offered by the program, but should not be considered a financial tool that can be used to finance the program over the long-term.
- As mentioned in the previous task, grant funding can be a valuable tool when starting-up an environmental enforcement program. **However, grants are not to be used to finance these programs indefinitely. Eventually, the local government must make the financial commitment to finance the program because it believes the benefits of the program far out-weigh the costs of the program.**

Options that the manager may wish to consider using in financing the environmental enforcement program are the following:

**AD VALOREM TAXES
SOLID WASTE USER FEES
TIPPING FEES
GRANTS (SHORT-TERM ONLY)
SUPPLEMENTAL ENVIRONMENTAL PROJECTS (S.E.P.)**

SECTION 6 – PROGRAM ADMINISTRATION

- Local governments may also need to identify several funding sources in order to operate an enforcement program. With funding being available from multiple sources, local governments may need to obtain funds from different department and agencies. For example, the litter control program in Scott County, Iowa is operated in the county's environmental health, department with funding provided from several different county programs as well as assistance from the solid waste commission.

MONITORING OF KEY OPERATING ACTIVITIES

In order to ensure that the local government's program is effective, it is essential that the community track the necessary key operating data so the success of the program can be measured. Collected data should also be used in educational efforts and to help target messages for various audience. Listed below are the tasks that need to be completed in order to monitor the operational performance of the program.

- The manager should construct a mapping system that will allow the local government to track the physical location of illegal dumpsites. Using a grid, the city or county could be divided into numbered sections. This method, used by Harris County, Texas, helps identify problem areas, and the section numbers can be included as part of the illegal dumping case number by the enforcement officers. Harris County case numbers include the precinct number, section number, and a "C" or "P" to designate whether the dumping is on public or private property. In addition, these dumpsites could be cataloged by type (e.g. residential, commercial, brush trimmings/yard waste, C&D, hazardous, etc.). To the extent repeat complaints arise about additional waste being dumped at a site already catalogued, this information should be noted. This will help identify the "chronic" dumpsites. Surveillance can be increased in the "chronic" areas, thus increasing the city or county's chances of catching the illegal dumpers in the act.
- The manager needs to begin developing a database of "key activities" which will allow him/her to measure the performance of the program.

Data which should be tracked in this database includes, but is not limited to the following:

- **NUMBER OF COMPLAINTS RECEIVED REGARDING ILLEGAL DUMPING**
- **NUMBER OF COMPLAINTS RECEIVED REGARDING LITTERING**
- **NUMBER OF SITES FOUND BY SURVEILLANCE**
- **NUMBER OF WARNINGS ISSUED**
- **NUMBER OF CITATIONS ISSUED**
- **NUMBER OF COURT CASES TRIED AND CONCLUDED**
- **NUMBER OF CONVICTIONS**
- **DOLLAR AMOUNT OF FINES**
- **NUMBER OF DUMPSITES CLEANED UP THROUGH ACTIONS**
- **CUBIC YARDS (OR TONS) REMOVED THROUGH CLEANUP ENFORCEMENT**
- **NUMBER OF TRAINING ACTIVITIES ATTENDED AND CONDUCTED**
- **NUMBER OF COMMUNITY EDUCATION ACTIVITIES ATTENDED AND CONDUCTED**

SECTION 6 – PROGRAM ADMINISTRATION

- If the local government has access to a GIS system, this system should be used to overlay the dumpsites identified on the mapping system (described in the previous task), where they can then show the proximity to water sources (lakes, streams, creeks, wells, etc.), schools (increased chance of injury to children playing in the area), etc.

The data captured in the local government's database, and mapping system should be updated on either a weekly or monthly basis. This data should then be tabulated in a report that will allow the manager to track the key activities associated with the program.

REVIEW OF OVERALL PROGRAM EFFECTIVENESS

On either a semi-annual or annual basis the manager should review the environmental enforcement program to determine whether the program is meeting its stated objective: the reduction of illegal dumping within the community. To assist in this review, the manager should review the tasks within each of the three primary areas of responsibility:

- Completion of general administrative duties and tasks
- Management of financial resources
- Monitoring of key operating activities

The previous pages of this section have provided a detailed description of the key tasks within each of these primary areas of responsibility. By reviewing these tasks, the manager can begin to evaluate the performance of the program. In particular, Responsibility C: Monitoring of Key Operating Activities will provide a wealth of data to help the manager in evaluating the performance of the program.⁴¹

Case Study: Detroit, Michigan

Illegal dumping data from police files and court records was evaluated. Arrest records revealed that 72 percent of the dumping arrests occurred between 5:00 p.m. and midnight, 57 percent of the dumping arrests took place on Tuesdays and Wednesdays, 66 percent of the vehicles used were pickup trucks, and 90 percent of the offenders resided within the city. The data was used to make adjustments in surveillance schedules and tactics. Court records revealed that 62 percent of the offenders did not pay fines imposed and were issued lien warrants. Contact: Gregory Moore, Environmental Affairs Department (313) 237-3095.

*This is yet another example of how knowing **WHERE** the illegally dumped material is coming from helps environmental enforcement focus their illegal dumping efforts, which cuts down on wasted time and manpower.*

SYNOPSIS

- Program administration must be addressed on an on-going basis. The four areas of major responsibility for managers are: administrative, financial, data monitoring, and evaluation.
- Administrative duties include oversight of the education program, the citizen call-in system, integration with other solid waste management programs, and general operational procedures. The administrator is also the liaison between the department and other agencies.
- Financial duties include preparation of the annual budget, tracking of actual versus budgeted expenses, and identifying available funding sources.
- Managers should develop and maintain a database of "key activities" which can be used to measure the effectiveness of the program. Such data should include the number of complaints received and cases prosecuted. Dumpsites should also be mapped.
- Data should be used to help evaluate the overall program effectiveness.

⁴¹ Therefore, it is critical that the manager take the time at the beginning of the program to put in place the necessary tools (computers, etc.) that will allow him/her to create the databases that will permit him/her to track the financial performance, as well as operational performance of the environmental enforcement program.

APPENDIX A:

**SAMPLE BUDGET, EDUCATIONAL MATERIALS
AND REFENCES**

- **ANNUAL EDUCATIONAL PROGRAM BUDGET**
- **SAMPLE NEWS RELEASE**
- **PUBLIC EDUCATION REFERENCES**
- **HAZARDS AND NEGATIVES ASSOCIATED WITH ILLEGAL DUMPING**
- **SAMPLE BROCHURES**
- **IOWA DEPARTMENT OF NATURAL RESOURCES: 2002 ILLEGAL DUMPING SURVEY**
- **SAMPLE ILLEGAL DUMPING DATABASES**

SAMPLE PROGRAM BUDGET

The following budget was designed for a start-up education program for a rural county with a limited budget. It may be considered a minimal education budget.

ANNUAL EDUCATIONAL PROGRAM BUDGET

Item	Description	Cost
Brochure	Estimate includes writing, design, and printing of brochure. Quantity 10,000 in 2 colors on recycled paper. Design costs may be contained by using desktop publishing software.	\$1,500-\$2,000
Press Releases	Estimate based on 5 hours per press release at \$15/hour of direct salary and benefits charged to program, or for contracted services. Based on 12 press releases/year.	\$1,000
Fliers	Estimate is for copying costs of producing fliers for community events and general distribution to specialized audiences. Based on 2,000 copies.	\$100-\$150
Display	Estimate based on lightweight, Velcro-type, three-panel tabletop display. (\$200) and photos or artwork for display (\$200).	\$400
Slide show	Estimate based on taking and developing slides, and writing of slide script for public presentations. Based on 30 hours at \$15/hour for public information personnel or contracted services.	\$450
TOTAL	All items above.	\$3,450 - \$4,000

PUBLIC EDUCATION REFERENCES

City of Chicago

Department of Environment

30 N. LaSalle Street, Ste. 2500

Chicago, IL 60602-2575

(312) 744-8096

www.ci.chi.il.us/WorksMart/Environment

Contact: Carmen Driver

City of Houston

Neighborhood Protection Program/ Rat on a Rat

2931 W. 12th St.

Houston, TX 77008

(713)654-6102

Contact: Tom Collins

Franklin County District Board of Health

410 High Street

Columbus, OH 43215-4562

(614)462-3160

Contact: Mitzi Kline

Harris County Precinct Three

Environmental Enforcement Division

16635 Clay Road

Houston, TX 77084

(281)371-0566 or 0565

Contact: Captain Ted Heap

Keep America Beautiful

www.kab.org

Kentucky NREPC

Cleanup Kentucky

14 Reilly Road

Frankfort, KY 40601

(502) 564-6716

North Central Texas COG

P.O. Box 5888

Arlington, TX 76005-5888

(817)695-9229

www.nctcog.dst.tx.us

Contact: Charlotte Ross

Operation Brightside

2375 Hampton Avenue

St. Louis, MO 63139

(314) 781 - 4556

PhilaPride

1818 Market Street, Ste. 3510

Philadelphia, PA 19103-3681

(215)575-2210

Contact: Mark Vigiano, Executive Director

Solid Waste Authority

Palm Beach County

7501 N. Jog Road

West Palm Beach, FL 33412

(561)697-2700, Ext. 4701

Contact: Joanna Aiken, Community Service Coordinator

Stop Oregon Litter and Vandalism (SOLV)

P.O. Box 1235

Hillsboro, OR 97123

(503)844-9571

info@solv.org

Contact: Jack McGowan, Executive Director

Texas Commission on Environmental Quality

P.O. Box 13087

Austin, TX 78711-3087

(512) 239-1000

www.tceq.state.tx.us

SAMPLE NEWS RELEASE⁴²

FROM: (Contact person and telephone number)

DATE: (Date sent out)

TAKING OUT THE TRASH? MAKE IT LEGAL

Tossing trash along a riverbank or in the woods is illegal for good reason, says (name of county/city official or environmental enforcement officer). It's also illegal to let refuse blow from the back of pickups and trucks. That's because trash that ends up along roads and waterways can cause extreme damage to the environment, animals, and humans. Trash spoils the natural beauty that characterizes (your county/city). And people who litter will choose to throw their garbage into areas where trash has already accumulated.

"In the long run, illegal dumping costs a lot more than it costs to collect and dispose of these items legally," (name of local official or environmental enforcement officer) says.

The first thing to do is to cut down the amount of your garbage which needs to be disposed of by separating out the materials that can be recycled locally. In (name of city/county), (list what can be recycled) are recyclable. (Explain how and where people can recycle locally, including hours of operation).

"If items like broken furniture, surplus building materials, or large, old appliances, are too worn to be given to someone else who can reuse or repair them, they should be disposed of legally," (name of local official or environmental enforcement officer) says. To find out how to correctly throw away these items in (your county/city), call (county/city) Solid Waste Department (telephone number).

###

⁴² *Combating Illegal Dumping*, Oregon Department of Environmental Quality, Solid Waste Programs, July 1996, p.9.

HAZARDS AND NEGATIVES ASSOCIATED WITH ILLEGAL DUMPING

Health Risks

- Drinking water quality issues related to non-point source pollution (especially in areas with private wells)
- Flooding caused by debris/wastes that clog drainage ditches and waterways
- Habitat/breeding grounds for disease-carrying vectors
- Indirect exposure to toxic chemicals/hazardous wastes
- Inhaling pollutants carried by smoke from open burning (“burn barrels”, etc.) and dump fires
- Direct contact exposure to sharp objects, medical wastes, caustic substances, and fire (especially a risk for children playing in the areas)

Environmental Risks

- Groundwater and surface water contamination
- Air pollution
- Impact on wildlife and aquatic habitat

Financial Costs

- Financial burden on taxpayers and utility ratepayers
- Diversion of local staff and equipment resources from other local public needs (public works staff, police, public attorneys)
- Increased law enforcement costs
- Increased administrative costs
- Private sector business costs
- Private property owner cleanup costs
- Property devaluation and potential loss of opportunities to develop land and attract additional business opportunities (such as tourism)
- Lost disposal revenues at permitted public and private disposal facilities (illegally dumped waste bypasses billing system)
- Reduced local government tax revenue from less successful permitted private disposal facilities (wastes bypassing billing system)

Aesthetic Costs

- Offensive sights and smells
- Negative perceptions of community values of residents
- Negative perceptions of capital investment value by potential new businesses

A sampling of educational brochures from other states has been included in this resource guide, for your information. They may be used to help write or design a brochure tailored to local environmental enforcement programs.

A listing of the enclosed brochures and key contact names follow.

Ozark Rivers Solid Waste District
Trash Patrol – (800) NO2-DUMP
Tamara Snodgrass
(573) 265-2993

City of Dubuque, Iowa
If you see Illegal Dumping
Paul Schultz
(563) 589-4249

City of Council Bluffs, Iowa
Give Us A Hand
Donn M. Dierks
(712) 328-4667

North Central Texas COG
Stop Illegal Dumping In Its Tracks
Charlotte Ross
(817) 695-9229

Iowa Department of Transportation
Adopt-A-Highway
Contact Local Adopt-A-Highway Chapter near You

Prairie Solid Waste Agency
Prairie News
Leslie Bullock Goldsmith
Toll Free: 866-282-8787

If you live in the counties of
Dent, Gasconade, Maries, Phelps,
Pulaski or Washington and witness illegal
dumping or know of an existing dump site,
please call the Ozark Rivers Solid Waste
District's Trash Patrol Hotline at

1-800-N02-DUMP

Callers may remain anonymous.



Let's keep the Ozark Rivers District
free from trash and illegal dumping!!



If you see
**ILLEGAL
DUMPING**

Call 589-4345

FINES UP TO \$5,000

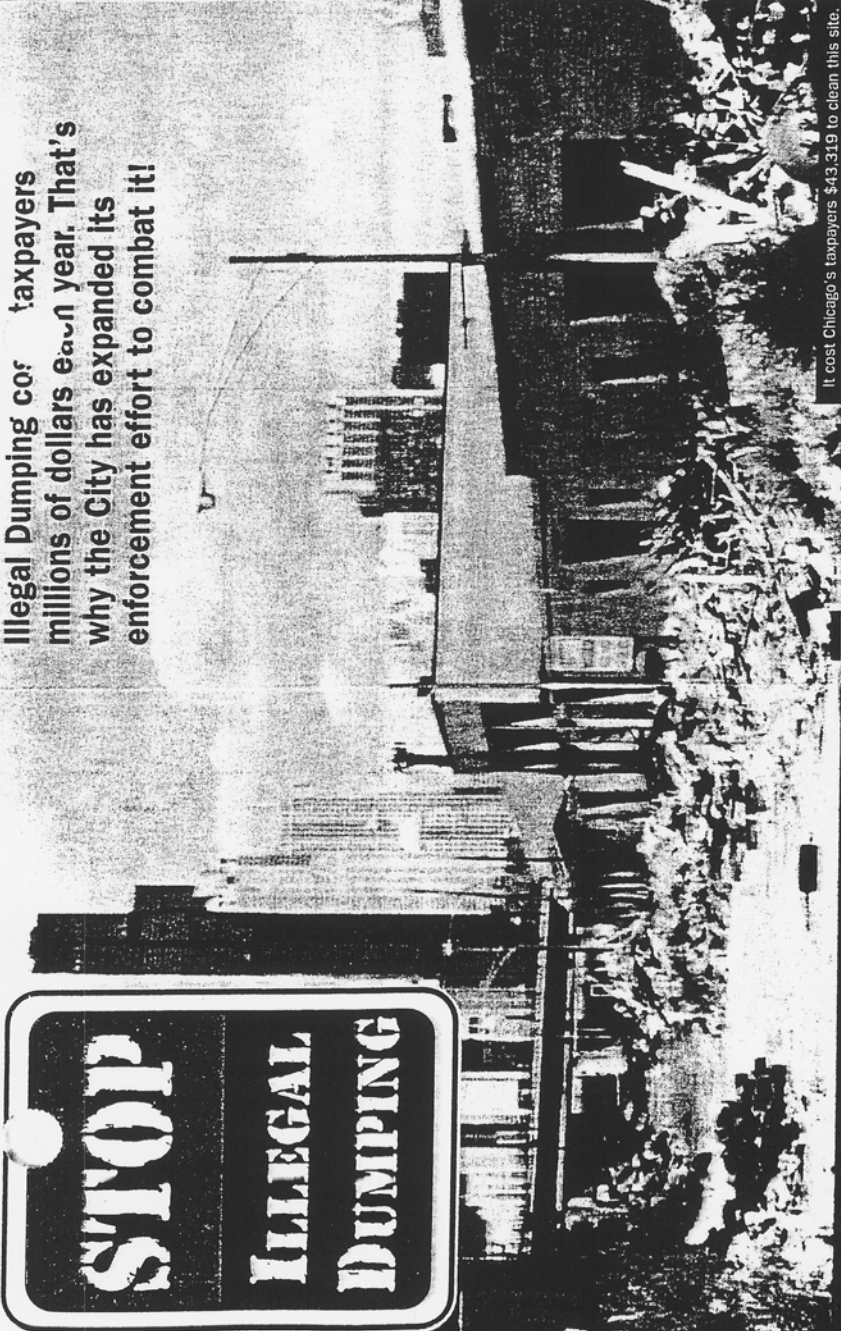


PH: 1-877-366-9812

Don't DITCH Us



*Please dispose of used
tires PROPERLY.*



Illegal Dumping costs taxpayers millions of dollars each year. That's why the City has expanded its enforcement effort to combat it!

HELP THE DEPARTMENT OF ENVIRONMENT CATCH ILLEGAL DUMPERS



City of Chicago
Richard M. Daley, Mayor
Department of Environment
Herbert A. Hendricks, Commissioner

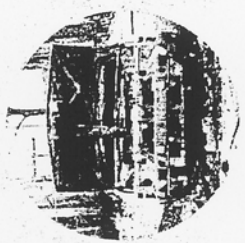
- Laws were changed to increase illegal dumping fines to \$1000 and \$2000.
- Jail sentences are imposed for offenders.
- Illegal dumpers are being aggressively prosecuted based on citizen information.
- Department of Environment Inspectors and Chicago Police are working together to set up surveillance on existing dumping sites.
- Streets and Sanitation crews impound vehicles immediately.
- Owners are held responsible for cleanup and security of their property.



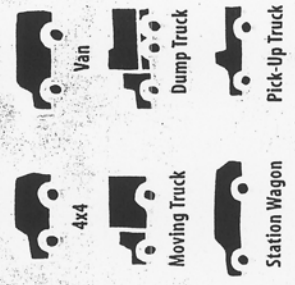
It cost Chicago's taxpayers \$43,319 to clean this site.

You can help STOP Illegal Dumping in your own neighborhood. . . here's how!

- Call 911 in an emergency, especially if the material appears to be hazardous or in suspicious containers such as drums.
- Call the Department of Environment in all other situations at 312/744-7672. An inspector will follow-up and issue a citation based on what you witnessed.
- **Important!** Make sure you get the vehicle's license plate number and any identifying marks such as name and color of the vehicle.
- If you identify a suspicious pattern of dumping, report it to the Chicago Department of Environment.
- Rewards are given for information leading to convictions.



Vehicle Types commonly involved in Illegal Dumping



- **What to remember about the vehicle**
- **License Plate Number**
- **Type of Vehicle**
- **Color of Vehicle**
- **Make a note of what is being dumped**

CALL 312-744-7672

**STOP
ILLEGAL
DUMPING**

**HELP
THE DEPARTMENT OF
ENVIRONMENT
CATCH
ILLEGAL DUMPERS**



It cost Chicago's taxpayers \$43,319 to clean this site.

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- Rewards are given for information leading to convictions.

CALL 312-744-7672

City of Chicago
Richard M. Daley, Mayor
Department of Environment
Henry L. Henderson, Commissioner

SEE THIS!



**SI OBSERVA A
BASURA ILLEGAL**

Anote el número de placas del vehículo
Anote una descripción del vehículo
Anote las cosas que están ilegalmente

**JĘŻELI WIDZISZ ŻE K
MIASTO NIELEGALNA
NA NUMER:**

Zapisz numery rejestracji
Zapisz jak auto wygląda
Zapisz co jest wyrzucone



North Central Texas
Council of Governments

**Stop
Illegal
Dumping**

It's Still in

places you have to
manage legally:

by government and
solid waste facilities;

ral Texas Council of
Database at
om/envir/sw/

JMP hotline and
ling your location,
wish to dispose of
telephone number.

region includes:

n, Ellis, Erath, Hood,
man, Navarro, Palo

personally!

y the Texas Natural
ation Commission
Central Texas
governments.

kwail, Somervell,
/ise Counties.

North Central Texas
Council of Governments

Stop Illegal Dumping

To find out what choices you have to
get rid of your garbage legally:

- Call your city or county government and ask them about local solid waste facilities;
- Access the North Central Texas Council of Governments' Facility Database at <http://www.dfwinfo.com/envir/sw/facility/facquery.html>;
- Call the 1-888-335-DUMP hotline and leave a message detailing your location, the type of waste you wish to dispose of or recycle, and your telephone number.

To Report Illegal Dumping Call:

THE NORTH CENTRAL TEXAS

ILLEGAL DUMPING HOTLINE

1-888-335-DUMP

24 HOURS A DAY

Remember to leave the following
information in your report:

- City and county in which the incident occurred
- Specific street location within the city
- License plate number and description of the vehicle
- Personal description of the violator
- Type of waste dumped
- Date and time of the violation
- Your name and telephone number
(optional, but helpful!)

Take it personally!

Our 16-county region includes:

Collin, Dallas, Denton, Ellis, Erath, Hood,
Hunt, Johnson, Kaufman, Navarro, Palo
Pinto, Parker, Rockwall, Somervell,
Tarrant, and Wise Counties.

Take it personally!

Funding provided by the Texas Natural
Resource Conservation Commission
and the North Central Texas
Council of Governments.



Stop Illegal Dumping In Its Tracks!

Dumping trash in unauthorized locations can cause public health and safety concerns. Broken glass, exposed metal and other dangerous materials can hurt children playing around illegally dumped debris. Rats, snakes, mosquitoes and other pests are attracted to and populate within dumped garbage. Costs for clean-up can run into the thousands or even millions of dollars. Illegal dumping also fosters a negative community image. People are much more likely to dump on property where a dumpsite already exists.

Stopping illegal dumping makes good environmental and economic sense, and it is everyone's problem. Solve it by working together with your local law enforcement officials for a cleaner, healthier, and safer community.

Penalties under the Texas Litter Abatement Act

Class C Misdemeanor
15 pounds or less or a volume of 13 gallons or less
Fine up to \$500

Class B Misdemeanor
More than 15 pounds but less than 500 pounds or a volume of more than 13 gallons but less than 100 cubic feet
Jail up to 180 days and fine up to \$2,000

Class A Misdemeanor
500 pounds or more or a volume of 100 cubic feet or more OR litter from a commercial purpose which weighs more than 5 pounds or has a volume of more than 13 gallons
Jail up to one year and fine up to \$4,000



Upgrading Charges and Felonies

If a person has been previously convicted of violating this Act, that person's punishment will upgrade to the next highest category for any subsequent violation. For example, if a person has a prior conviction of a Class A misdemeanor, that person's punishment will bump up to a State jail felony the next time he/she is convicted.

Common Illegal Dumping Violations Include:

- Throwing litter out of a car or boat;
- Dumping household trash, construction debris or yard waste on land that is not a legal landfill;
- Hauling trash for profit and dumping it on land that is not a legal landfill;
- Letting someone else dump waste on your property, whether they pay you or not;
- Pouring used motor oil or restaurant grease into storm drains or down manhole covers;
- Disposing of old cars by rolling them into a river.

What You Can Do To Help

Law enforcement officials need your help in fighting environmental crime. Citizens can take an active role in stopping illegal dumping by following the suggestions listed below:

- Always dispose of your own litter properly;
- Spread the word to friends and neighbors that illegal dumping is a crime;
- Do not transport unsecured debris in the back of a vehicle. Always use a tarp or other cover;
- Organize volunteer cleanups of illegal dumpsites. People are less likely to litter in clean areas;
- Write or call your city or county elected officials and let them know that illegal dumping is a concern in your community;
- Do not pay roofing or other contractors until they present you with a landfill receipt showing that your waste was properly disposed;
- Report illegal dumping to THE NORTH CENTRAL TEXAS ILLEGAL DUMPING HOTLINE: 1-888-335-DUMP.

Adopt-A-Highway is an innovative program developed by the Iowa Department of Transportation to increase public awareness of environmental needs along Iowa highways by making sections of roadsides available for "adoption." This gives the adopting individuals or groups opportunities to improve the appearance of our roadsides throughout the state.

Activities may include litter removal and planting and/or maintenance of trees, shrubs, wildflowers and native grasses. Other activities are eligible with approval from the department. Seeds may be harvested and used to plant other public lands. However, seeds harvested on public lands cannot be sold.

Highway adoptions can be used to make the entrance, or gateway, to a community more inviting and offer a proud welcome.

To allow greater participation in the program, a group or an individual may only adopt one entryway to a community.



Caring for roadsides will not only make them more attractive to the traveling public, but will also make major improvements in our environment.

Grassy roadsides provide habitat for ground nesting birds such as pheasants, quail, meadowlarks and many other song birds.

Roadsides also provide excellent habitat for other wildlife. Many roadside plantings provide a source of food for wildlife.

Property owners may wish to adopt sections adjoining their land and will be given the first opportunity to do so. Second preference is given to governing bodies of small communities and urban areas. Final preference will be given to organizations, clubs and individuals.

Adoptions will not be allowed for political parties, political candidates, elected officials or entities that would constitute partisan endorsements. Any organization or individual whose sponsorship may have an adverse effect on the program is also ineligible.

Groups or individuals adopting sections of highway will be responsible for that roadside for a minimum of two years. Litter removal must be done at least twice a year or as necessary to keep the area clean. Litter pickup on primary roads must include both sides of the highway. Interstate highway litter pickup will be on one side of the highway.

Litter removal is automatically included in every Adopt-A-Highway sponsorship even though the main project may be landscaping or another activity.

In addition to litter pickup and beautification projects, adopting groups may also control noxious weeds by using DOT-approved methods, which may include hand weeding.

A minimum distance for adoption is one-half mile for special project work. However, adoption of at least two miles is required for litter pickup. Smaller sections may be permissible on stub routes or unusual sections of highway.

While working along a highway can be fun, safety of workers is a priority. Adopting organizations are required to hold safety meetings before work begins. Participants 14 years of age or younger should have adequate adult supervision.

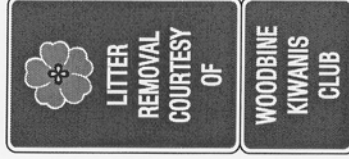
Participants must also wear safety vests when working on the highway right-of-way. Vests and orange trash bags will be furnished by the DOT.

For the safety of persons picking up litter, they should not pick up large objects or anything on or within 10 feet of the pavement. Picking up litter from the medians is not allowed. If sponsors encounter anything they regard as hazardous, they should not pick it up, but should notify the DOT.



The sponsor must be willing to separate litter according to the requirements of the landfill used by the local DOT maintenance garage. The sponsor may remove any recyclables and take them to a recycler of the sponsor's choice.

Signs featuring our state flower, the wild rose, will be erected by the DOT at no cost to the sponsor to recognize the efforts of adopting groups or individuals. In areas with many signs or very rough terrain, Adopt-A-Highway signing may not be possible.



Signing is not a requirement for Adopt-A-Highway sponsorships. Sponsors may elect to adopt a highway section without signing.

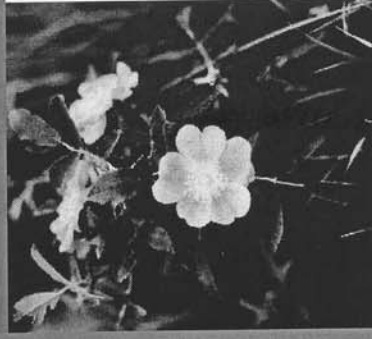
The Adopt-A-Highway program allows individuals or groups to do one or more eligible activities on a segment of highway. These activities can reduce litter along highways, enhance the environment, beautify roadsides, and build broad-based community support for anti-litter and highway beautification programs. New ideas on how to beautify our roadsides are encouraged.

Through this program, adopting groups of individuals will gain recognition for themselves and build a positive image for the state.

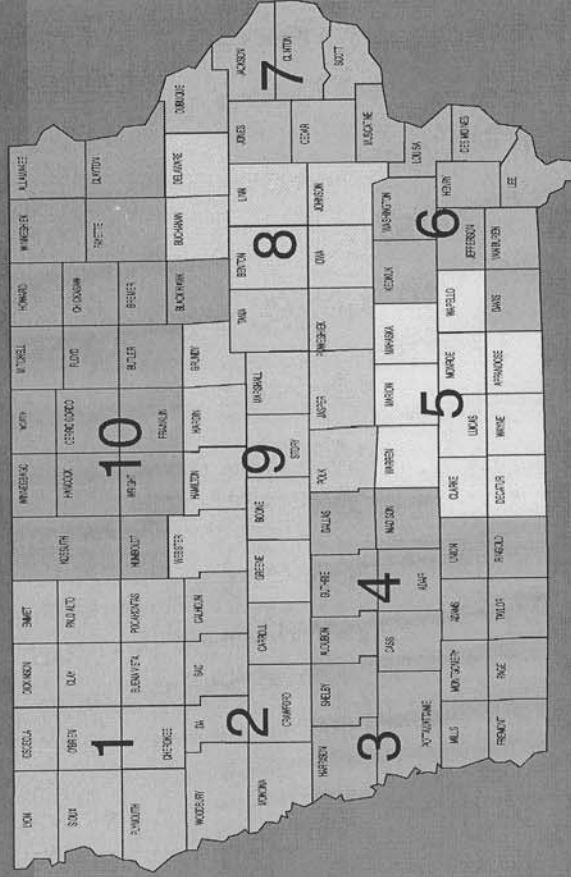
Beautification projects may also be done along roads other than primary or state highways. People wishing to initiate beautification projects along a county road should contact their county conservation boards or county engineers for details.

Adopt-A-Highway Area Representatives

Iowa's Adopt-A-Highway Program



Caring for roadsides will not only make them more attractive to the traveling public, but will also make major improvements in our environment.



1. Lois Syndergaard, Storm Lake, 712-732-4514
2. Jennie Sorensen, Denison, 712-263-3347
3. Lana Bruning, Council Bluffs, 712-366-4642
4. Marcia Buboltz, Atlantic, 712-243-3355
5. Wendell Laing, Chariton, 641-774-2420
6. Tammy Hamilton, Fairfield, 641-472-6142
7. Marilee Plyter, Dyersville, 563-875-2375
8. Jerome Steward, Cedar Rapids, 319-365-3558
9. Anna Hartwig, Ames, 515-233-9574
10. Linda Kolfoot, Decorah, 563-382-4565

If you would like to be a part of a program that's creating a lasting impression for this and future generations to enjoy, or would like more information about this program, contact the Adopt-A-Highway representative nearest you.

2002

Did you know. . .

Recycling saves natural resources, reduces pollution and saves landfill space.

For example, when paper is made from recycled materials, the process requires 61% less water, produces 70% fewer pollutants and saves 65% more energy than paper made from trees.

*Recycling—
it's the right
thing to do!*

**New name, new
facility in 2002**

*The Union County
Landfill
Commission
is now:*

**Prairie Solid
Waste Agency**
Operating the Union
County Landfill, the
Prairie Regional
Collection Center and
the former
TAURUS program.

Extend Tire Life with Proper Maintenance and Good Driving Habits!

It's true. Tires can last up to twice as long, and go twice as far, if they're properly maintained...and if you drive...well, a little more gently. Follow the suggestions below, and save money by buying fewer tires -and less gasoline too-over the lifetime of your vehicles.



- ◆ Check tires once a month for proper inflation.
- ◆ Replace tires with less than 1/16" tread.
- ◆ When replacing tires, be sure to choose the right type and size for your vehicle.
- ◆ Avoid rapid acceleration and braking.
- ◆ Keep tires balanced, aligned and rotate according to vehicle/tire guidelines.
- ◆ When your tires are worn out recycle with your tire dealer or at your landfill.

Call the Union County Landfill for Tire Recycling rates—641-347-8813.



Adams, Taylor and Union Counties.

The PRAIRIE Regional Collection Center (RCC) for Household Hazardous Materials is open for business. Prairie RCC accepts household items that cannot be disposed of in the landfill or down the drain.

Lawn and garden chemicals, household cleaning and improvement products (paint, stain varnish), and automotive products are just a few of the materials that can be taken to the RCC.

Materials will be taken by appointment only.

Questions?

**Phone:
866-282-8787.**

**Prairie
Regional
Collection
Center
brings
you
safe
hazardous
materials
Disposal**

By
*Leslie Bullock
Goldsmith*

Great Aunt Ida moved to a nursing home, and you're elected to get her house ready for a sale. What can you do with all the hazardous materials under Ida's sink and in the garage?

Convenient, proper disposal of household hazardous materials is now a reality for residents of

**Questions/
Appointments
Toll Free 866-
282-8787**

Recycling Opportunities

Recycle these items in a green bin near you:



See Page 4
for Green Bin
Locations

<p>NEWSPAPER, MAGAZINES, CATALOGS PHONE BOOKS AND WHITE OFFICE PAPER</p>	<p>ALL GO IN NEWSPAPER BIN. Newspapers and phone books go in <u>loose</u> (not bagged). Bag magazines and catalogs Bag white paper to separate from other materials. Recycle computer, typing, letterhead and copy paper. White envelopes with or without window. Colored ink is okay. Staples are okay.</p>
<p>CLEAR GLASS JARS AND BOTTLES</p>	<p>Please remove and discard lids. Rinse glass. No need to remove label. Clear glass only. <u>NO</u> colored glass, window glass, light bulbs, drinking glasses or mirrors</p>
<p>TIN, STEEL, ALUMINUM CANS</p>	<p>Empty and rinse – no need to remove label. Crush cans if possible to conserve bin space. Lids may be recycled or discarded. <i>Clean tin foil, pie tins, food cans accepted.</i> <u>NO</u> paint cans or aerosols.</p>
<p>PLASTIC BOTTLES AND JARS</p>	<p>Must have a #1 or #2 symbol. Empty and rinse – no need to remove label. <i>Discard lids.</i> DO RECYCLE: milk, water, soap, detergent, shampoo, ketchup and peanut butter containers along with other types of #1 and #2 containers Check for #1 or #2 on the item! <u>NO</u> Ice cube trays, toys or motor oil containers. <u>NO Medical waste</u>, sharps, tubing, or IV Bags!</p>
<p>Separate Locations: CORRUGATED CARDBOARD</p>	<p>Recycle cardboard at the City Carton Recycling Facility 1451 Highway 34 West, Creston. Look for the sign on the west side of the building. Cardboard recycling containers are available for <u>non-commercial</u> use at grocery stores in Creston. Openings are on sides of containers. <i>Look for the "cardboard only" containers.</i> Staples are OK! <u>Corrugated only—No</u> 12 packs, cereal boxes or wax coated boxes.</p>

Appliances: Don't ditch 'em!

Old appliances are not just garbage! Most old appliances represent a disposal challenge to residents and landfills across Iowa.

What's the challenge? Appliances may contain a number of hazardous chemicals and products that, by state law, must be removed and disposed of safely. This process is costly!

Once the hazardous materials like mercury, PCBs and refrigerants have been removed, appliances are typically recycled to reclaim metal. In past times, metal recycling paid enough of a dividend to fund removal of hazardous materials.

Now, with new state appliance manufacturing requirements and low prices for scrap metal, this recycling service has become expensive.

So don't be surprised if you're asked to pay a fee to dispose of old appliances at your scrap dealer or local landfill. (Call your landfill for rate information).

What can you do?

When you purchase a new appliance, ask the seller to remove old appliances as part of the sale.

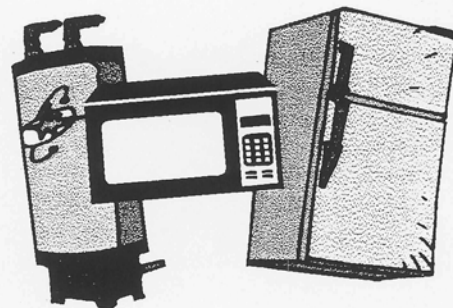
Take good care of your appliances and they'll last a long time. Donate items that still work to those in need.

Contact your local energy provider to see if they have any rebate program for customers replacing older model appliances with newer more energy efficient models.

And whatever you do, be a responsible consumer. Don't dump in ditches! Each year county and state roads crews spend lots of time cleaning up illegal dump sites. Who pays for this costly cleanup and disposal? You, the taxpayer!

If you see someone illegally dumping anything, contact your county sheriff's office, or Prairie Solid Waste Agency.

Let's keep Iowa beautiful and stop dumpers in their tracks!



Appliances include
(but are not limited to) :

Refrigerators
Freezers
Ovens
Dehumidifiers
Water Heaters
Space Heaters
Washers
Dryers
Microwaves
Air Conditioners
Dishwashers
Furnaces

Electronics like TV's and computers from residents are not yet banned from Iowa's landfills. Check with your landfill about possible recyclers in your area.



More disposal information:

Your local landfill will recycle waste tires for a small fee—please call for rates (see phone number on page 4).

Recycle Motor Oil with your local automotive service dealer—Adams, Taylor and Union County residents can also recycle oil (no drums please) at Prairie Regional Collection Center—call for an appointment—phone number is on front page.

Call: 1-800-8-BATTERY to find out where to recycle batteries. Landfill alkaline batteries.

Check with your local government about sites for yard waste. Need backyard composting information? Call Prairie SWA Toll Free at 866-282-8787.

Junk Mail: Contact DMA Mail Preference Service
PO Box 9008
Farmingdale, NY 11735-9008
Include: name, address, zip code and a request to activate preference service.

Dispose of sharps (syringes and lancets) safely! Contact your

medical professional or trash hauler regarding local sharps disposal rules.

Dry old latex paint out. Landfill cans once paint is no longer drippy. Do not recycle these cans in green bins! Store other types of paint—like oil-based for disposal at a hazardous materials facility or toxic cleanup event.

If you have clean usable clothing or furniture you don't want, hold a yard sale or donate it to your local Neighborhood Center or church group. Keep usable items out of our landfill!

Prairie Solid Waste Agency
Prairie Regional Collection Center
1774 Lark Avenue
PO Box 227
Creston, IA 50801

Phone/Fax: 641-782-5822
Toll Free: 866-282-8787
Email: recycle@iowatelecom.net
Website: creston.heartland.net/taurus/

Other Resources:

City Carton of Creston
Highway 34 West
Creston, IA 50801
Phone: 641-782-6681
or toll free 800-369-6112

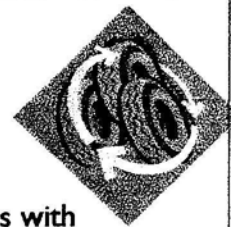
**Iowa Department of
Natural Resources**
Waste Management Assistance Division
Phone: 641-281-8941

Union County Landfill
1774 Lark Avenue
(4 miles east of Creston,
south of Highway 34)
Phone: 641-347-8813

Waste Management of Creston
Phone: 641-782-7777
Toll Free: 800-622-8224

It's up to you to do the right thing!

Nearly 3 million tires are discarded annually in Iowa. When tires are worn out, be sure to dispose of them properly.



- When you buy new tires, recycle the old ones with your tire dealer—there may be a small fee, but it's worth it.
- Landfilling tires is prohibited, but many landfills accept tires for recycling for a fee. Car tires are \$1.40 at the Union County Landfill.
- It is illegal to stockpile waste tires without a permit. Water and litter collects in these old tires, making them a perfect environment for disease carrying mosquitoes and other pests. Report large tire piles to the Iowa Department of Natural Resources (IDNR), 515-281-4367.
- Burning tires is also against the law in Iowa. Tires release noxious smoke when burned. To report tire burning, call IDNR at the number above.

No More Free Lunch (Tire Disposal)

The grant program that supported the county's Free Tire Cleanup Days has been discontinued as of June 2002. This was a 6 year program set to help Iowans clean up tire stockpiles. Now it's up to you to recycle tires as you buy new ones.

Thanks for helping to take care of our environment!

This newsletter is printed on recycled content paper and has been funded by an Iowa Department of Natural Resources Waste Tire Management Grant and by Waste Management of Creston.



Residents of Adams, Taylor and Union Counties recycled 634 tons of material in area green bins in 2001! That's 80 tons more than in 2000.
Keep up the good work!

It's so easy to do the right thing...

Recycle at a convenient green bin!

Recycling bins are out there...where you live and shop. All you need to do is collect the "right stuff" (see page 2).

Drop recyclables off at any of these convenient locations:

- Adams County:** -Corning (Corner of 8th and John Streets)
-Prescott
- Taylor County:** -Bedford (HyVee), Blockton, Clearfield,
-Lenox and New Market
- Union County:** -Afton
-Creston (Econofoods, Fareway, HyVee, and the City Carton Recycling Facility Hwy 34 West)
-Lorimor

And in the **Madison County** town of Macksburg

IOWA DEPARTMENT OF NATURAL RESOURCES: 2002 ILLEGAL DUMPING SURVEY

Please complete this survey in regard to illegal dumping in the county/city for which you officiate, based upon your position as a city/county official. Keep in mind that illegal dumping, also known as open dumping or midnight dumping, occurs when waste of any type is disposed of in unpermitted areas.

Answer each question completely and continue on extra pages if necessary.

Name/Title _____ City/County _____

Phone number _____ E-mail address _____

Circle appropriate response, with 1 representing “not at all” and 5 representing “very”:

	Not at all		Somewhat		Very
Do you feel that illegal dumping is a major problem in your city/county?	1	2	3	4	5
Do you feel that the state should be more involved with illegal dumping issues in your city/county?	1	2	3	4	5
To what extent do you think local governments should be responsible for the remediation and monetary expenses associated with illegal dumpsites?	1	2	3	4	5
To what extent do you think state government should be responsible for the remediation and monetary expenses associated with illegal dumpsites?	1	2	3	4	5

1. Where does illegal dumping commonly occur in your county/city? *Check all that apply.*

- _____ Abandoned lots/buildings
- _____ Along roadsides
- _____ Abandoned houses
- _____ Ditches/open fields
- _____ City/county parks
- _____ Residences/Businesses
- _____ Rivers/streams/lakes
- _____ Wooded areas
- _____ Other, please specify _____

2. Are locations with historical illegal dumping problems monitored? Yes _____ No _____

If *yes*, how so?

3. What types of waste are commonly found at illegal dumpsites in your county/city?

- _____ Tires
- _____ Appliances (white goods)
- _____ Construction and demolition waste (building materials, roofing shingles, etc.)
- _____ Common household waste

- ☐ Yard waste (brush, tree limbs, lawn clippings, etc.)
- ☐ 55-gallon drums
- ☐ Dead animals
- ☐ Commercial waste
- ☐ Bio-medical waste
- ☐ Agricultural waste
- ☐ Other, please describe _____

4. Does your county/city have ordinances, statues or local regulations regarding illegal dumping?
Yes____No____ **If yes, please attach a copy or provide a brief description.**

4a. Do the regulations outline monetary fines issued for individuals caught dumping illegally?
Yes____No____

5. Does your city/county have a set process for investigating an illegal dumpsite? Yes____ No____
5a. If yes, what agency conducts illegal dumping investigations?
Agency, Contact name, Contact phone number

6. Please estimate the number of illegal dumping cases that were reported in your city/county from December 31, 2000 through December 31, 2001?
☐ None
☐ 0-10
☐ 11-20
☐ More than 20

7. How can citizens report illegal dumping activities?

8. Does city/county staff engage in illegal dumping clean-up/remediation activities?
Yes____ No____
8a. If yes, what city/county agency is responsible for the clean up?
Agency, Contact name, Contact phone number

8b. What city/county agency **pays** for the clean up?

8c. Please estimate the amount of time/money spent in the past fiscal year (01) on the remediation/clean-up of illegal dumps in your county/city?

Thank you for your time and assistance. Please use the space below to offer suggestions or express concerns about illegal dumping issues in your county/city.

Date	Dump Location		Reported by	Phone #	Problem	Volume	Id Material From			Action	Staff	time	\$disposal
	Address	Street					Name	Address	Street				
09/16/2002	29xx	hillside	Dispatch		dump edge of st (meth?)	3-13g bags	Kennedy, Kathy		2032	Washington	pu	MC	
09/16/2002	2929	Elm	Welsh		alleged neighbor dump						pu	MC	
09/16/2002	1701	Central	Steffen, Charles	583-1177	alleged neighbor dump	5 bags	Smith, Kari J		1715	Central	pu	AH	
09/16/2002	2926	Washington	Weber, Jerri	557-9134	in her setout can	4- 20g bags in can	Schneider, Thomas		2922	Washington	pu	MC	
09/17/2002	2826	Burden	Wagner, Peg		alleged neighbor dump	1 tire					pu	mc	
09/17/2002	29xx	hillside	Park		dump edge of st (meth?)	3-13g bags	Kennedy, Kathy		2032	Washington	pu	MC	
09/17/2002		Arrowstar			dump edge of st	3 bags					pu	MC	
09/17/2002	3080	Karen	customer		dump in back yard	3bags					pu	buck	
09/17/2002	Factory Card Outlet		Kim Runde	584-0606	dumpster filling	bottles, pipes					record	ve	
09/17/2002	190	JFK	Runde, Kim	584-0606	dumping in dumpster	misc	NA						
09/18/2002	Hawthorn Boat Ramp		Sweeney, Kevin		Dump in city cans	?	Gau, Eugene		1355	O'Hagen	pu	DS	
09/18/2002	Hawthorn Boat Ramp		Sweeney, Kevin		Dump in city cans	?	Middlemann, Norman		PO Box 1502		pu	DS	
09/18/2002			Connor, Gary		dump at neighbor		Jackie Atchison		2992	Hillcrest	pu	Craig	
09/19/2002	2222	Queen			objects to PAYT	bikes, tires					Not out	ds	
09/23/2002	1000 Blk	Gar. Rhom. Alley	NA	NA	Alley&Sidewalk	1 Bag	NA						\$2
09/25/2002	Grove Terrace Steps		Russel, Terry		Dump ROW	microwave					pu	4001	
09/27/2002	2237	Washington	neighbor		bags in alley setout	6 bags maggots					pu	ds	
10/04/2002	1473	Central	Kilty, Mike	582-9043	dump in alley ROW	2 metal cabinets					pu	4001	
10/06/2002	behind DBG on Central			vm	2 boys on skateboards dumping						inves	ds	
10/08/2002	1454	Iowa	Gulyaysh, Chris	556-6200	NA	bags	NA				pu		
10/14/2002	550	Central	Allendorf	583-6603	alleyline	1 bag	NA		558 1/2	Central	pu	Kevin	10 min
10/14/2002	1915	Central	NA	582-5614	curbside	bags	NA		NA				\$2
10/15/2002	1530	Cerro Dr.	Gottshalk, Harold	583-6019	1bag dropped off	1 Bag	Ruff, Eric J		2650	Mesa Dr.			
10/15/2002	1248	Jackson	Warnke, Rod	556-7469	dropping at his residence	bags	NA						
10/15/2002	2569	Chaney			found in street	1 bag	Yvonne Kruser		2645	Chaney Rd.	pu	Kevin	5/min
10/16/2002	2460	Central(alley)	Mootz, Cletus	556-3223	alleyline	2 bags	Mathews, Jeff		75 W. 24th		pu	Dave	1 hour
10/21/2002	2307	Stafford	Address Owner	557-9121	2 bags dropped at his res.	2 bags	Ms. Shirley Schmit		821	Althausen	pu	Tom	
10/23/2002	995	W. Locust	Crew/ Craig	NA	2 bags dropped at his res.	2 bags	Huston, Marylou		1124	High Bluff	pu	Craig	
10/25/2002	980	Victoria	Stevenson, Rita	NA	1 bag dropped off	1 Bag							
10/28/2002	466	W. 3rd	Aldeman, Mark	583-7521	4 bags dropped off	4 bags	Robinson, David		727	Caledonia	pu	Tom	5/min
10/28/2002	2720	Andrew Ct		557-5001	curbside	2 bags	Thoms, Erik T		1120	Nowata	pu	Tom	5/ min
10/29/2002	470	W. Locust	Manders, Albert J		curbside	2 bags	Sarah Anthony		444	Angella	pu	Dave	5/min
10/31/2002	789	Chestnut	anonymous		curbline	1 bag	NA				pu		
11/01/2002	1701	Central	Steffen, Charles	583-1177	curbside	1 bag	Toni Brown		1715	Central Apt 2	pu	Dave	10 min
11/01/2002	Dead end	Wheatland	Greg Kuhl	City	Dead end	5 Bags							
11/01/2002	20271/2	Washington	Sandy Tilton	582-1834	alleyline	1bag	NA		2034	Jackson	pu	Dave	5/min
11/01/2002	422	Garfield	Rob Klauer	556-8616	dumpster filling	floor tile	Rettenmaier, Steve					dispatch	
12/11/2002	695	Perry	Francis Conlon	582-1171	dumped in driveway	1 Bag	Mr. & Mrs. Becwar		576	Central	collected	Dave	5-min
12/13/2002	1299	Locust	Dan	543-0105									

Date	Hauler	Ticket	Total Wt	MSW	Tires \$16	Appliances	Furniture	Metal	C&D	Other	From/Items	Notes	\$
05/03/02	City of Creston												
05/06/02	Union Roads		0.12						0.12				
05/14/02	Union Roads		4.46						4.46				
05/29/02	Union Roads		4.39						4.39				
05/30/02	Union Roads		0.58	0.58	13						wire stove, furnace, dishwasher Mike King - freezer		
06/13/02	City of Creston												
06/26/02	Union Roads												
06/28/02	Union Roads		0.35						0.35				
07/11/02	Union Roads		0.65						0.65		microwave/TV		
07/16/02	Union Roads				9								
07/17/02	City of Creston		0.06	0.06									
07/17/02	Union Roads		0.07	0.07									
07/17/02	Union Roads		0.63	0.3	2	2			0.33				
07/18/02	Union Roads		0.63	0.63	10								
08/02/02	City of Creston												
08/12/02	City of Creston					1							
08/12/02	Union Roads				2								
08/19/02	Union Roads		0.38	0.38									
08/21/02	Union Roads		0.57					0.57					
08/26/02	Union Roads					2							
08/28/02	Union Roads		0.1								p/u by Ken Hudson sofa 4 car 1 truck city barn		
09/03/02	Union Roads						0.1						
09/10/02	City of Creston												
09/11/02	City of Creston		1.41		5			0.52	1.41				
09/17/02	Union Roads		0.52										
09/17/02	Union Roads		0.4			2			0.4		12 Mile		
09/17/02	Union Roads		0.38	0.38		1							\$15.00
09/25/02	Union Roads		0.58						0.58				
09/27/02	Union Roads		3.67						3.67				
10/01/02	City of Creston				7	3					30 1 tractor tire included, furn, wash, hwh		\$68.40
10/02/02	Union Roads		0.08					0.08					
10/02/02	Union Roads				8					1.25 1 w/rim			\$16.20
10/02/02	Union Roads		1.07						1.07		large tires		\$6.40
10/03/02	City of Creston				2						frig dryer furnace		\$25.00
10/08/02	Union Roads		0.04	0.04		3							
10/14/02	Union Roads												
10/17/02	Union Roads	51048	0.01	0.01							TV		
10/28/02	Union Roads	51279	0.12		5								
10/31/02	Union Roads	51288			13					\$11.25	9 w/ rims @ 1.25		
11/21/02	Union Roads	51685			14	2					12 car, 2 truck dumped east of creston		
11/27/02	Union Roads	51748	0.18		7						car 150th and Jaguar		
11/27/02	Union Roads	51750			5	2			0.18		mwl/ dehum		
11/27/02	Union Roads	51760			3								
11/27/02	Union Roads	51769			23								
12/03/02	Union Roads	51830	0.16		9	1		0.16			Arispe area AC		
12/03/02	Union Roads	51838	0.15						0.15		Arispe		
12/03/02	Union Roads	51849				1					frig		
12/03/02	Union Roads	51847	0.31						0.31		3x5 and 1x\$15		
12/03/02	City of Creston				6	4							
12/10/02	Union Roads	51957	0.29	0.29							1 car 1 tractor Osage St		
12/12/03	Union Roads	52004			2								
12/13/03	Union Roads	52032	0.25						0.25				
12/16/03	Union Roads	52068	0.26						0.26				
12/19/03	City of Creston	52126			8						6 car 1 truck		
	Total		49.15		549	58			37.6				

